

**Arizona  
Commodity Supplemental  
Food Program**

**Policy and Procedures Manual**

Federal Fiscal Year 2008

August 15, 2007

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## Section 1 – Program Overview

In FY 2007 the Arizona Commodity Supplemental Food Program (CSFP) continues to provide nutrition assistance and education to some of the most vulnerable and at-risk populations in Arizona. A major change is the food distribution infrastructure for the program has been completed. The merger Westside Food Bank, the major CSFP food distribution contractor with the St. Mary's Food Bank of Phoenix has been completed. The combined organization is now known as the St. Mary's Food Bank Alliance and continues providing CSFP commodity distribution to 10 of the 11 counties served by Arizona CSFP. The Community Food Bank of Tucson continues to provide distribution services in Pima County but has also begun serving select communities in Cochise and Santa Cruz Counties.

The Arizona CSF Program is currently serving approximately 90 % of its assigned caseload. The program manager is working with the various service providers to find methods to improve overall program participation to a minimum of 95% of the assigned caseload. The program is undertaking an extensive outreach activity to seniors in the currently served areas to inform potentially eligible individuals of the availability of services.

In State Fiscal Year 2008, the Arizona Department of Health Services has received a special appropriation from the state legislature totaling \$440,000.00. The legislature has directed that these funds be utilized to provide commodity food boxes to low-income seniors (60 years and older) in rural counties not currently being served by the federal CSF Program. ADHS staff is currently developing plans to provide these services in the unserved counties (Apache, Navajo, Graham, and Greenlee). This program is intended to augment current services and will not overlap current CSFP services in other areas of the State.

The CSF Program continues to be co-located with the Arizona WIC Program, Arizona Nutrition Network, and the Arizona WIC Farmers' Market Program in the Bureau of Chronic Disease Prevention and Nutrition Services (BCDPNS). This structure facilitates the coordination of nutrition services and messages between all of the programs. The following state-level BCDPNS staff are involved in administration, coordination, technical assistance or training for CSFP.

Margaret Tate, M.S., R.D., Chief, Bureau of Chronic Disease Prevention and Nutrition Services (BCDPNS)

Karen Sell, R.D., USDA Nutrition Programs Manager, BCDPNS

Bryan Mitchell, M.S., CSFP Manager

Stacy Beauregard, Administrative Services Officer, BCDPNS

The Arizona Department of Health Services has negotiated multi-year formal agreements with eleven entities for the provision of certification and enrollment for CSFP services, as well as two food banks for food storage, handling, and distribution. Local agencies providing certification and enrollment include seven

county health departments, two community health centers, and two food banks. These contracts will be continued and may be expanded as additional caseload becomes available.

Certification and nutrition education services are provided through the providers by means of Inter-Governmental Agreements (IGAs) and contracts. Contracts for certification and nutrition education services from the non-profit agencies and for food storage, handling and distribution from the food banks are awarded to the agencies based upon a competitive bid process, including Requests for Proposal (RFPs), as required by the State Procurement Code.

The bi-annual CSFP newsletter, "Nutri-News", continues to be distributed and reviewed with the participants at certification and contains all the mandatory nutrition education elements.

St. Mary's and Community Food Banks each continue to put additional nutrition education and community referral information into the food boxes when packing.

CSFP local agencies are encouraged to utilize the 5 a Day for Better Health message in promoting the fruits and vegetables provided in CSFP food packages.

Local CSFP Enrollment/Nutrition Education agencies are also linked to the Arizona Gleaning Project to provide distribution of gleaned fresh produce along with the CSFP food packages in as many locations as possible.

A Management Evaluation was completed for one-half of the local agencies this year and both food banks. The schedule for FY2008/2009 Management Evaluation visits follows in Table 2.

<b>Table 2 Management Evaluation Site Visits</b>	
<b>FY2008</b>	<b>FY2009</b>
<u><b>Certification</b></u> Clinica Adelante Community Health Center Cochise County Health Department Gila County Health Department Yuma Food Bank – Certification  <u><b>Food Storage, Handling and Distribution</b></u> Community Food Bank Westside Food Bank	<u><b>Certification</b></u> Pinal County Health Department Pima County Health Department Yavapai County Health Department St. Mary's Food Bank Alliance-Certification Mariposa Health Center Mohave County Health Department Coconino County Health Department <u><b>Food Storage, Handling and Distribution</b></u> Community Food Bank St. Mary's Food Bank Alliance

## **Goals and Objectives**

### **Goal 1: Improve the health of Arizonans by providing quality nutrition services, food security and promoting healthy lifestyle changes.**

#### Objective 1.1:

Provide at least 16,625 Commodity Supplemental Food Boxes to low-income women, children and seniors monthly.

#### Objective 1.2:

Manage food delivery systems with providers to ensure appropriate distribution of foods to each local agency and to participants.

#### Objective 1.3

Work with service providers to more fully incorporate automation into the accountability and delivery of CSFP services.

#### Objective 1.4:

Maintain participation at 100 percent of assigned monthly caseload throughout FY2008.

### **Goal 2: Deliver courteous, efficient, responsive and cost-effective services to external and internal customers, stakeholders and key policymakers.**

#### Objective 2.1:

Conduct process evaluation of CSFP activities.

#### Objective 2.2:

Conduct CSFP client satisfaction survey.

#### Objective 2.3

Conduct CSFP outcome evaluation study.

### **Goal 3: Strengthen community partnerships by providing quality technical assistance, collaborative planning and training.**

#### Objective 3.1:

Conduct regularly scheduled meetings with local agencies to discuss caseload management, nutrition education, policy and procedures and upcoming events.

#### Objective 3.2:

Research food security issues and utilize findings in planning for CSFP services in FY2008.

Objective 3.3:

Participate in partnership meetings (example: Arizona Farmers' Market Nutrition Program Partner's meeting and other community groups) to address hunger needs in Arizona.

**Goal 4: Develop and implement disease prevention and health promotion strategies in order to decrease chronic disease and disability among Arizonans.**

Objective 4.1:

Develop and distribute CSFP-specific Nutrition Education (Nutri-News) periodically throughout the year.

Objective 4.2:

Identify and maintain standard referral information for local agencies to provide to CSFP clients on Food Stamps and TANF.

## **Appendix A Federal-State Agreement**

**On file with USDA, new agreement not required.**

# Chapter One

## Eligibility Criteria

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### Overview

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#### Policy

Individuals applying for enrollment in the Arizona CSFP program must meet all the following eligibility criteria before they can be certified to participate:

- Category
  - Residence
  - Income
- 

#### Contents

This chapter is divided into sections which detail categorical and residency requirements for eligibility, and an appendix of certification definitions.

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# Chapter One

## Eligibility Criteria

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### Section A Category

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#### Documentation of Identity

An applicant is required to show documentation of identity that includes the birth date at the initial certification. Documentation type must be noted on the Client Registration screen of the AIM system.

Acceptable Documentation includes but is not limited to:

At initial certification

- Passport
- Drivers License
- Birth Certificate
- Immunization Card
- Current photo Identification issued by a government agency.

At subsequent certification and pick-up

- CSFP ID folder
- 

#### A potential participant must be:

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#### Pregnant

A pregnant woman; or

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#### Postpartum/ Breastfeeding

A postpartum/breastfeeding woman up to one (1) year after the end of the pregnancy; or

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#### Infant

Breastfeeding is encouraged in Arizona. Infants are not served.

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#### Child

A child from age one (1) until the last day of the month of her/his sixth (6) birthday; or

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#### Elderly

An adult 60 years or older.

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# Chapter One

## Eligibility Criteria

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### Section B Residence

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#### A potential participant must:

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#### Local Agency Service Area

Reside in the local agency's service area as defined by the local agency Policy and Procedure Manual.

Note: Tribal members who live on reservations that border on or are partially located in Arizona and who receive health services in Arizona are eligible for services from the Arizona CSFP program.

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#### Documentation of Residency

Is required at each certification.

Acceptable forms of documentation include but are not limited to:

- Utility bill showing a billing address within the local agency's service area
- Rent or mortgage document
- Valid drivers license with current address

The type of documentation is recorded on the Family Information screen of the AIM system. An applicant with a good reason for not having proof of residency, such as homeless, migrant, victim of loss, must sign a waiver. (See Appendix 1)

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#### Institutional Residence

If the participant resides in an institution (e.g. homeless shelter, shelter for victims of domestic violence, home for unmarried mothers ), the following conditions must be met:

- CSFP benefits the participant and not the institution (ie. The institution must not accrue financial or in-kind benefit from the resident's participation in CSFP):
  - CSFP foods are used by the CSFP participant only; and
  - The institution allows and encourages the participant to partake of supplemental foods and all associated CSFP services made available to participants by the local agency (e.g. education, referral).
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# Chapter One

## Eligibility Criteria

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### Section C

#### Income

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#### Introduction

In order to maintain program integrity, income documentation will be requested at each certification.

Documentation cannot be a barrier to services.

This section is divided into four (4) sections, which define income and detail income determination and income exclusions.

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# Chapter One

## Eligibility Criteria

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### Section C1

#### Determining Household Size/Economic Unit

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**Definition**

Household is defined as a group of related or non-related individuals who are living together as one economic unit.

Household members share economic resources and consumption of goods and/or services. The terms “economic unit” or “household size” can be used interchangeably. However, “economic unit” may be a more appropriate term to use because it conveys that familial relationship is not relevant to the determination of family size and income.

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**Resident of Institution**

The residents are assessed as separate family units.

The institution must meet the conditions as outlined in the previous section on residency.

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**Pregnant Woman**

A pregnant woman’s household is assessed by increasing it by the number of expected infants.

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**Teen**

An applicant who is eighteen (18) years of age or older will have her household assessed following the rules which apply to any other economic unit.

An applicant under 18 years of age must provide documentation of emancipation from a court of law to be considered separate household. She is otherwise counted as a member of her parents’ household.

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# Chapter One

## Eligibility Criteria

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### Section C1

#### Determining Household Size/Economic Unit (Cont)

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<b>Co-living</b>	Two (2) separate families residing at the same address under the same roof may be considered: "Separate households/economic units". The key is whether they share a "common income". If each household has its own source of adequate income (rent, food, utilities, and other), they are considered and evaluated as: "Separate households/economic units".
<b>Foster Child</b>	If a child is in the care of foster parents, Child Protective Services (CPS), or other child welfare authorities may consider the child a family of one (1). The placement paper, commonly called "Notice to Provider," is required to make the foster parents the authorized representatives. Documentation of this paper should be recorded in the Notes section of the Client Registration screen of the AIM system. The same placement paper is acceptable documentation for adjunctive eligibility if the CMDP medical insurance number is listed. The payments made by the welfare agency or received from other source for the care of that child will be considered to be the only income.
<b>Adopted Child</b>	When a child has been adopted by a family, the child is counted in the household size of the family. The size and total income of that household will be used to determine if the child is income eligible for CSFP.
<b>Separated Family</b>	When a family separates, the child is counted in the family of the parent or guardian with whom the child lives. Child support payments are considered income for the family with whom the child lives, but cannot be deducted from the income of the person making the payments.
<b>Custody</b>	The parents with whom the child spend(s) a majority of his/her time can claim the child in reporting household size. As per Section C-3, however, all child support must be reported as income.
<b>Military Family</b>	A military dependent (child or woman) placed in the temporary care of friends or relatives may be counted as a separate economic unit. There must be documentation of an allotment payment, which is adequate to support the individual.

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# Chapter One

## Eligibility Criteria

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### Section C2

#### Income Guidelines

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An applicant will have income eligibility determined according to the following guidelines:

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#### **Date of Income Determination**

Determination of income eligibility will be made at the time of certification. The date of certification noted on the consent/release form and the identification folder/transfer card will be the date income eligibility was determined.

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#### **Income Standards**

The State agency has implemented the income standard of 185% of the current DHHS Poverty Guidelines as its eligibility standard for women and children and 130% of the current DHHS Poverty Guidelines as its eligibility standard for the elderly. Local agencies will implement the State established income eligibility standards for their program.

All data used to determine income eligibility will be reflective of the applicant's total household income and applicant's status at the time of certification.

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# Chapter One

## Eligibility Criteria

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### Section C2

#### Income Guidelines (Cont)

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#### Documentation

All income reported must be confirmed by paper or an official verification system such as dial-up confirmation with AHCCCS. Photocopies are not required by the State, but the source of income must be documented on the Client Registration screen of the AIM system. If documentation is not available on the day of certification, it must be provided within thirty (30) calendar days, and the applicant will receive one food box. If income documentation is not provided within the 30-day period, applicant(s) will be terminated. The number of household members is noted on the Client Registration screen of the AIM system.

Acceptable types of documentation include but are not limited too:

- Pay Stubs
- W-2 forms,
- Unemployment form

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#### Income Waiver

If after exploring all possible income sources, the applicant cannot document income or declares no income exists; furthermore, eligible recipients must sign a statement to that effect. (See Appendix B Chapter 2 - Income Documentation Waiver). This is valid for the entire certification period.

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#### Adjunctive Eligibility

Adjunct eligibility occurs when an applicant, or in some cases, a family member, is participating in a federal or state program with income guidelines that are equal to or below the CSFP income guidelines. The applicant is allowed to enroll in the CSFP program without duplicating the initial income screening process.

An applicant is adjunctively income eligible for CSFP if documentation shows that the individual:

- is certified as fully eligible to receive benefits from either the AHCCCS, TANF, or Food Stamp Program (women, children and elderly).
- Has applied for TANF or AHCCCS
- is a member of a household containing either a TANF recipient or a pregnant woman or infant on AHCCCS

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# Chapter One

## Eligibility Criteria

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### Section C2

#### Income Guidelines (Cont)

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##### **Documentation Adjunctive Eligibility**

The local agency will use income information appropriate to the circumstances of the applicant. The type of documentation will be noted on the Client Registration screen of the AIM system.

Acceptable Documents (eligibility dates must be included):

- TANF approval letter
- AHCCCS decision letter
- Food Stamp approval letter

##### **Migrants**

Determination of income eligibility will be made once every twelve (12) months for migrant field workers and their families. Migrant status will be indicated on the Arizona CSFP identification folder. Therefore, even migrants with expired CSFP identification folders are exempt from having income determination repeated within a twelve (12) month period.

##### **Disqualification during a certification period**

Individuals may be disqualified during a certification period if a reassessment identifies that they are no longer income eligible or adjunctively income eligible. However, such persons cannot be disqualified from CSFP solely on the basis of cessation of benefits from TANF, AHCCCS or other State-administered programs. They will then be reassessed under other income criteria before being disqualified.



# Chapter One

## Eligibility Criteria

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### Section C3

#### Gross Income Determination

<b>Income</b>	Gross cash income before deductions for income taxes, employee's social security taxes, insurance premiums, bonds, etc.
	<b>Income includes the following:</b>
<b>Wages</b>	Monetary compensation for services including wages, salary, commissions, or fees.
<b>Active Military Payments</b>	Recent leave and earning statement to include their FSSA allotment.
<b>Farm/Self-Employment</b>	Income from farm and non-farm self-employment. This is net income (total dollars made in the business minus operating expenses) as calculated by schedule C of IRS form 1040 or a ledger of business operations.
<b>Social Security</b>	Check stub/award letter as documented by current bank statements.
<b>Dividends/Trusts/Rental Income</b>	Dividends or interest on savings or bonds, income from estates or trusts, or net rental income as documented by Federal Income Tax Record for most recent calendar year.
<b>Public Assistance</b>	Person(s) receiving AHCCCS, TANF, FDPIR, or Food Stamp benefits are considered income eligible for CSFP.
<b>Unemployment</b>	Unemployment compensation as documented with approval letter or check stub(s).
<b>Retirement/Pensions/Annuities</b>	Government civilian employee or military retirement or pension or veteran's payments. Private pensions or annuities. Documentation includes income tax return for most recent calendar year.

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# Chapter One

## Eligibility Criteria

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### Section C3

#### Gross Income Determination (Cont)

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**Alimony and  
Child Support**

Child support payments are considered income for the family with whom the child lives, but cannot be deducted from the income of the person making the payments.

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**Contributions**

Appropriate documentation would be a letter from the person contributing resources to the household who is not residing there.

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**Royalties**

Net Royalties

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**Other Cash  
Income**

Other cash income includes, but is not limited to, cash amounts received or withdrawn from any source, including savings, investments, trust accounts, and other resources which are readily available to the family.

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**Lump Sum  
Payments**

Lump Sum Payments that represent “new money” that is intended for income is counted as income. Lump sum payments include gifts, inheritances, lottery winnings, worker’s compensation for lost income, severance pay and insurance payments for “pain and suffering”. Lump sum payments for winnings and proceeds from gaming, gambling, and bingo are also counted as income. Lump sum payment may be counted as annual income, or may be divided by 12 to estimate a monthly income, whichever is most applicable.

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**Student  
Financial  
Assistance**

Student Financial assistance used by the student for room and board and for dependent care expenses is considered income.

Note: Financial assistance that is used for tuition, transportation, books, and supplies is exempt as noted in Section C4.

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# Chapter One

## Eligibility Criteria

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### Section C4

#### Income Exclusions: Not Counted as Income

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**Income exclusions include but are not limited to the following:**

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**Military  
Housing  
Allowance**

Any basic allowance for quarters received by military services personnel residing off military installations or bases.

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**In-kind/non-  
cash benefits**

Any benefit, which is of a value, which is not provided in the form of cash money, is considered an in-kind benefit and is not counted as income.

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**Federal  
Program  
Benefits**

Benefits provided under the following Federal Programs or acts include but are not limited to:

Reimbursements from the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended in 1987.

Any payment to volunteers under Title I (Volunteers in Service of America (VISTA) and others or Title II (Retired Senior Volunteers Program (RSVP), Senior Companions Program (S.P.), Foster Grandparents Program, and others) of the Domestic Volunteer Services Act of 1973, to the extent excluded by the act.

Payment to volunteers under Section 8(b)(1) of the Small Business Act Service Corps of Retired Executives (SCORE) and Active Corps Executives (ACE).

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# Chapter One

## Eligibility Criteria

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### Section C4

#### Income Exclusions (Continued)

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#### Federal Program Benefits (Continued)

Payment received under the Job Training Partnership Act (Adult and Youth Training Programs, Summer Youth Employment and Training Programs, Dislocated Worker Programs, Programs for Migrant and Seasonal Farm Workers, Veterans and the Job Corps).

Payments under the Low-income Home Energy Assistance Act, as Payments under the Disaster Relief Act of 1974, as amended by the Disaster Relief and Emergency Assistance amendments of 1989.

Payments received under the Carl D. Perkins Vocational Education Act, as amended by the Carl D. Perkins Vocational and Applied Technology Education Act Amendments of 1990.

The value of assistance to children their families under the National School Lunch Act, as amended, the Child Nutrition Act of 1966 and the Food Stamp Act of 1977, including benefits from the:

- National School Lunch Program
- Special Milk Program
- School Breakfast Program
- Summer Food Service Program
- Child and Adult Care Program
- Food Stamp Program
- Food Stamp Program
- Food Distribution Program on Indian Reservation (FDPIR)
- TANF
- The Emergency Food Assistance Program (TEFAP)

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*Continued on next page*

# Chapter One

## Eligibility Criteria

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### Section C4

#### Income Exclusions (Continued)

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#### Federal Program Benefits (Continued)

Student financial assistance received from any program funded in whole or part under Title IV of the Higher Education Act of 1965 which is used by the student for tuition, fees, books, materials, supplies, transportation, and miscellaneous personal expenses related to the student's education. The student must be attending the educational institution on at least a half-time basis as determined by the institution. (This does not include room and board and dependent care expenses.)

Assistance includes:

- Pell Grants
- Supplemental Educational Opportunity Grants
- State Student Incentive Grants
- National Direct Student Loans
- College Work Study
- Byrd Honor Scholarship programs
- Payments pursuant to the Agent Orange Compensation Exclusion Act
- Payments received for Wartime Relocation of Civilians under the Civil Liberties Act of 1988 (e.g. for those in Japanese-American internment camps)

The value of any child care payments made under section 402 (g)(1)(E) of the Social Security Act, as amended by the Family Support Act, including

- AFDC
- Title IV-A Child Care Program
- JOBS Child Care Program

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*Continued on Next Page*

# Chapter One

## Eligibility Criteria

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### Section C4

#### Income Exclusions (Continued)

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##### **Federal Program Benefits (Continued)**

The value of any “at risk” block grant child care payments made under section 5081 of Public Law 101-508, which amended section 402(l) of the Social Security Act.

The value of any child care provided or paid for under the Child Care and Development Block Grant Act, as amended.

Mandatory salary reduction amount for military personnel, which is used to fund the Veteran’s Educational Assistance Act of 1984, as amended.

Payments received under the Old Age Assistance Claims Act, except for per capita shares in excess of \$2,000.

Payments received under the Cranston-Gonzales National Affordable Housing Act, unless the income of the family equals or exceeds 80% of the median income in the area.

Payments received under the Housing and Community Development Act of 1987, unless the income of the family increases at any time to more than 49% of the median income of the area.

Benefits received through the Farmers Market Demonstration Project under Section 17(M)(7)(A) of the Child Nutrition Act of 1966, as amended.

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##### **Bank Loans**

Loans, such as bank loans, are not counted as income.

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##### **Lump Sum/Large Cash Payments**

Lump sum payments or large cash settlements (e.g., compensation for a loss such as an insurance settlement to pay for damage to a house or car). Also includes payments that are intended for a third party to pay for a specific expense (e.g., payment for medical bills resulting from an accident or injury.)

If the lump sum payment is put in a savings account and the household regularly draws from that account for living expenses, the amount withdrawn is counted as income.

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# Chapter One

## Eligibility Criteria

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### Section C4

#### Income Exclusions (Continued)

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**Income of /  
payments to  
Native  
Americans**

Income derived from certain submarginal land of the United States, which is held in trust for certain tribes.

Payments for relocation assistance for Navajo and Hopi Tribe members.

Payments to the Blackfeet, Groventre and Assiniboine tribes (Montana) and the Tohono O'odham Nation, a.k.a. Papago tribe (Arizona).

Payments to the Red Lake Band of Chippewas, the Chippewas of Mississippi, and the Turtle Mountain Band of Chippewas (Arizona).

Income derived from the disposition of funds to the Grand River Band of Ottawa Indians.

Payments received under the Program for Native Americans.

Payments to the Passamaquoddy Tribe and the Penobscot nation or any of their members, received pursuant to the Maine Indian Claims Settlement Act of 1980.

Payments received under the Alaska Native Claims Settlement Act.

Payments received under the Sac and Fox Indian Claims Agreement.

Payments received under the Judgment Award Authorization Act, as amended.

Payments received under the Saginaw Chippewa Indian Tribe of Michigan Distribution of Judgment Funds Act.

Payments to the Assiniboine tribe of the Fort Belknap Indians Community and the Assiniboine Tribe of the Fort Peck Indian Reservations (Montana).

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# Chapter One

## Eligibility Criteria

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### Section D

#### Nutrition Risk

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**Criteria**

The State of Arizona CSFP program will use the nutrition risk of low income for all applicants that meet categorical, residential, and income eligibility.

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## Chapter Two

### Certification Standards and Procedures

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#### Overview

**Definition**

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Certification is the process by which a person is enrolled in the CSFP program.

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**Contents**

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This chapter is divided into sections which detail time periods for certification, forms used for certification and their function, certification standards and procedures, and appendices.

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## Chapter Two

# Certification Standards and Procedures

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### Section A

#### Certification Periods

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**CSFP program services are based on the following certification time frames:**

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<b>Pregnant Women</b>	<p>Certification will be valid up to six (6) weeks postpartum.</p> <p>All documentation, which includes the date when the certification ends, must read “up to six (6) weeks postpartum.”</p> <p>A pregnant woman enrolled in CSFP who has had an abortion, spontaneous (miscarriage) or therapeutic, is eligible to receive services until six (6) weeks past the date the pregnancy ended. Those participants then can apply for services as a postpartum woman.</p>
<b>Breastfeeding/ Postpartum Women</b>	<p>A breastfeeding/postpartum woman is eligible to participate for up to 1 year postpartum to the infant’s first birthday) and is certified at approximately 6-month intervals.</p>
<b>Child</b>	<p>Children are certified for six (6) month periods ending with the last day of the month in which the child turns six (6) years of age.</p> <p>Note: If a child is still in a valid certification period (has not yet received six food boxes in the current certification period) in the month s/he turns six (6), a food box can be issued even if the pickup is after the birthday.</p>
<b>Elderly Persons</b>	<p>Elderly persons are certified for six (6) months. Local agencies are authorized to certify elderly persons for an additional six (6) months without collecting new eligibility data if there are no women or children waiting to be served. Local agencies do, however, need to confirm the participant’s address and continued interest in receiving benefits.</p>

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## Chapter Two

### Certification Standards and Procedures

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#### Example

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Six (6) Month Certification Periods (to be used for completing CSFP identification folders):

Certification begins in:	Certification ends in:
January	June
February	July
March	August
April	September
May	October
June	November
July	December
August	January
September	February
October	March
November	April
December	May

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## Chapter Two

### Certification Standards and Procedures

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#### Section B

#### Forms Used in the Certification Process

(See Appendix A)

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The following forms may be used to certify applicants as eligible or ineligible for CSFP and notify them of the action taken on their application:

	Enrolled	On Waiting List	Ineligible
Consent/Release Form	X	If appropriate	If appropriate
I.D. Folder/Transfer Card (VOC*)	X		
Waiting List Form		X	
Ineligibility Form			X
Rights and Responsibilities Form			

\* VOC= Verification of Certification

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## Chapter Two

### Certification Standards and Procedures

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#### Section C

#### Function of Forms Used in the Certification Process

Name of Form	Function of Form
Rights and Responsibilities	<p><b>Details data necessary for determination of eligibility including:</b></p> <ul style="list-style-type: none"><li>• Applicant's name</li><li>• Applicant's identification number</li><li>• Applicant's address</li><li>• Date of initial visit</li><li>• Date of certification</li><li>• Gives permission to perform the tests necessary for CSFP certification and to release information to the Arizona CSFP program and to health care providers</li><li>• Verifies the above data through sworn statements signed by the participant or participant's authorized representative, and the certifier (including printed name and title)</li></ul>

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## Chapter Two

### Certification Standards and Procedures

---

#### Section C

#### Function of Forms Used in the Certification Process (Cont)

Name of Form	Function of Form
Arizona CSFP Program Identification Folder/Transfer Card	<ul style="list-style-type: none"><li>• Identifies participant</li><li>• Serves as a signature card for the authorized representative when picking up the food box</li><li>• Serves as a record of dates when certification period begins and ends</li><li>• Informs participant of CSFP appointments</li><li>• Informs participant of CSFP obligations</li><li>• Informs participant of where to report claims of discrimination</li><li>• Serves as a transfer document for participants who relocate</li><li>• Serves as identification of migrant status</li></ul>
Waiting List Letter	<ul style="list-style-type: none"><li>• Documents eligibility</li><li>• Establishes a place for the applicant on the waiting list</li></ul>
Ineligibility Letter	<ul style="list-style-type: none"><li>• Notifies participant of ineligibility for CSFP</li><li>• Informs participant of reason for determination</li><li>• Notifies participant of the right to appeal the determination</li><li>• Informs participant of where to report claims of discrimination</li></ul>

## Chapter Two

### Certification Standards and Procedures

---

#### Section D

#### Separation of Duties

---

<b>Definition</b>	A standard accountability/security practice to separate certification and food issuance responsibilities between more than one person when possible.
<b>Policy</b>	Local Agencies will separate staff activities (duties) in determining participant certification from the distribution of food boxes.
<b>Procedure</b>	Assign separate key duties to staff. Split the certification and food box distribution duties between different staff members to avoid a single person doing all functions of the certification, if possible.
<b>Conflict of Interest</b>	<p>CSFP staff who are related to or reside in the same household as applicants and/or participants in the CSF program shall not participate in the certification process or food box distribution of these individuals.</p> <p>The State agency encourages local agencies where possible to have different staff responsible for certification and draft issuance.</p>

---

## **Chapter Two**

### **Certification Standards and Procedures**

---

#### **Section E**

#### **Priorities**

---

**Priority Categories for CSFP services are the following:**

---

<b>Priority I</b>	Pregnant and breastfeeding women.
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<b>Priority II</b>	Children ages one (1) through three (3) years of age.
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<b>Priority III</b>	Children ages four (4) through five (5) years of age.
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<b>Priority IV</b>	Postpartum women
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<b>Priority V</b>	Elderly persons
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## Chapter Two

### Certification Standards and Procedures

---

#### Section F

#### Timetables

---

**Client Notification:**  
**Within 20 days**

All applicants requesting CSFP services are notified of their eligibility or ineligibility or placement on a waiting list within 20 calendar days from the date of request for CSFP services.

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*Continued on next page*

## Chapter Two

### Certification Standards and Procedures

---

#### Section F

#### Timetables (Continued)

---

##### **Local agency responsibility**

Local agencies will develop follow-up procedures to contact all those applicants who are potentially Priority I pregnant women and migrants who miss their certification appointments. Procedures will include the methods of contact, information to be collected, the date the applicant requests services, and rescheduling of failed certification appointments.

Time frames for completing the certification process, as specified above, begin when the applicant appears in person at the local agency and requests CSFP services.

Local agencies will maintain documentation of the date the initial request for services was made, and will enter this date on the Cert Action screen of the AIM system.

For applicants who miss their initial appointment, the local agency staff will attempt to contact them within two (2) business days by phone or mail. The next appointment offered will be based on the next available or local agency policy. This will then be documented. The date on which the applicant requests a new eligibility interview will become the "Date of the Initial Request."

When a pregnant woman requests an appointment, the local agency will request an address and telephone number where she can be reached. Should she fail to keep her certification appointment, the local agency will attempt to contact her to reschedule. A record of the attempt to contact her will be maintained by the local agency in the Appointment Scheduler of the AIM system.

Applicants failing to provide verification of eligibility data within the established time frame will be denied participation in the program. They may reapply as soon as they have the necessary documentation and the time frames begin at the time of reapplication.

---

## Chapter Two

### Certification Standards and Procedures

---

#### Section G Process

---

##### Eligibility Determination

Local agency staff determines if the applicant meets each of the following eligibility criteria:

- Categorical
  - Residence
  - Income
- 

##### Documentation

Using the AIM system, the local agency certifier documents:

- Applicant's name, identification number, ethnic code, date of birth, address and telephone number (if available);
  - The final determination made about eligibility.
- 

*Continued on next page*

## Chapter Two

### Certification Standards and Procedures

---

#### Section G

#### Process (Continued)

---

**Physical Presence** Applicants to the CSFP program are required to be physically present at the time of CSFP Certification.

**Exception 1**

A condition that requires medical equipment which is not easily transportable.

**Exception 2**

A medical condition that requires confinement to bed rest.

**Exception 3**

A serious illness that may be worsened by coming to the clinic.

All exceptions must be documented by a Medical or Osteopathic Physician, Nurse Practitioner or Physician Assistant. Included in documentation should be Date, Diagnosis and Reason for Inability to come to the clinic.

---

## Chapter Two

### Certification Standards and Procedures

---

#### Section H

#### Persons Eligible for CSFP Services

---

##### CSFP Program Rights and Responsibilities

For those applicants determined eligible to participate, the following will occur:

In a language the participant understands, the certifier will explain:

- Participant rights and responsibilities
- Arizona CSFP Program requirements
- Local agency requirements
- The prohibition of simultaneous participation in more than one (1) CSFP program and/or WIC
- The duration of the certification period
- The purpose of the identification (ID) folder/transfer card
- Importance of health care, referral list
- CSFP non-discrimination policy
- Right to appeal

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*Continued on next page*

## Chapter Two

### Certification Standards and Procedures

---

#### Section H

#### Persons Eligible for CSFP Services (Continued)

---

##### **Mandatory Referrals**

A written referral must be given to each adult applying for themselves or on behalf of others that includes:

- Food Stamps
  - TANF
  - Child Support Enforcement (Women and Children)
  - Medicaid/Medicare (i.e., AHCCCS)
  - Supplemental Security System (Elderly)
- 

##### **Health Services Available**

In a language that the participant understands, the certifier will discuss the availability of health services, including:

- The types of health services
  - The types of referral services
  - The location of services
  - How services are obtained
  - The reason why services are useful
- 

##### **Arizona CSFP Program ID folder/transfer card/VOC**

An Arizona CSFP Program identification folder/transfer card will be issued to the participant. The folder will include the participant's name, the date, the current certification expires and the name and address of the certifying local agency. The completed Consent/Release form will be retained in the daily or central file.

Participant and certifier sign the identification folder.

---

## Chapter Two

### Certification Standards and Procedures

---

#### Section I

#### Persons Not Eligible for CSFP Services

---

##### Notification of Ineligibility

The applicant will be given the Arizona WIC/CSFP programs “Notification of Ineligibility” which states the reason for the determination and how to appeal the decision. The applicant must sign the letter, indicating that she/he understood why she/he is not eligible.

- Categorical ineligibility;
- Residence outside of service area;
- Income above maximum allowable income;
- Current participation in another CSFP (Food Plus) Program or in WIC.

If the reason for ineligibility is in the “other” category on the form, the specific reason must be noted next to the check mark in the “other” box.

---

##### Information about reapplication

Applicants will be informed as to how to reapply if conditions change or if they obtain the necessary documentation.

---

##### Right to fair hearing

Applicants who are denied CSFP services must be notified of their right to appeal. Local agencies should try to resolve the applicant’s issues first, but the applicant must be given, in writing, the address of the State agency.

---

##### Referrals

Applicants will be given written information regarding other food assistance programs for which they may be eligible.

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*Continued on next page*

## **Chapter Two**

### **Certification Standards and Procedures**

---

#### **Section I**

#### **Persons Not Eligible for CSFP Services (Continued)**

---

##### **Timeline**

For those participants who become ineligible to continue participation in the Arizona CSFP program, the following will occur:

Local agencies will notify participants at least fifteen (15) calendar days prior to the effective date of their ineligibility.

Local agencies will notify participants at least fifteen (15) calendar days before the expiration of each certification period that their CSFP certification is soon to expire.

A person who is about to be suspended or disqualified from program participation, at any time during a certification period, will be advised in writing not less than fifteen (15) calendar days before the suspension or disqualification.

---



## **Chapter Two**

### **Certification Standards and Procedures**

---

#### **Section J**

#### **Waiting Lists**

---

##### **Policy**

When the number of participants receiving food packages each month exceeds the Local Agency's assigned caseload, a waiting list should be initiated. The lowest priority is closed first; the second lowest priority is closed next, and so on. Applicants are put on a waiting list until the priority is reopened. When a closed priority is opened, applicants are enrolled in a chronological order on the basis of the date of initial contact.

The Local Agency shall work with the State agency to implement these procedures and calculate the numbers.

---

## Chapter Two

### Certification Standards and Procedures

---

#### Section J1

#### Waiting Lists: Determination of Priority Closing

---

##### **Managing Caseload**

When the actual caseload numbers begin to exceed the assigned caseload numbers, priorities will have to be closed. The local agency will plan how many priorities need to be closed with technical assistance from the State agency.

After planning how many priorities should be closed, the Local Agency shall notify the State agency by e-mail or fax and obtain written consent from the CSFP Manager before closing any priorities. This will allow additional review(s) by the State agency of caseload numbers and the impact from adjustments to insure that the least amount of disruption to customer service occurs.

##### **Predicting Caseload**

In order to determine the priorities, which must be closed, use the following reports from the AIM System: Participation by Race and Ethnicity, Participant Status and the Termination reports. These reports will also assist in monitoring the caseload as the actual caseload numbers begin to adjust. Monitoring will be conducted on a monthly basis.

##### **Participation by Race and Ethnicity Report**

The AIM Actual Participation report lists participation by priority at the bottom of the page. By looking at the number of participants in each priority, a determination can be made regarding how many and which priorities must be served or closed in order to reduce caseload to the assigned numbers.

##### **Participant Status Report**

This report shows the number of certifications new to the program and in/out-of-state transfers which occurred in the previous month. It can be used to protect the approximate number of new applicants who may be added to the program in the coming months.

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*Continued on next page*

## Chapter Two

### Certification Standards and Procedures

---

#### Section J1

#### Waiting Lists: Determination of Priority Closing (Continued)

---

##### Termination Report

The number enrolled in each priority (whether open or closed) who are due for a new certification or termination for each of the next four (4) months can be determined by using this report. Use this to determine how quickly the caseload will drop due to the closed priorities. This can also be used to determine how many openings will be available monthly in the open priorities.

---

##### Priorities

Priorities are closed from the lowest to highest priority or subpriority; e.g., priority five (5) would be closed first followed by priority four (4), etc. When opening priorities, the highest priority will be opened first; e.g., priority four (4) would be opened before priority five (5).

---

## Chapter Two

### Certification Standards and Procedures

---

#### Section J2

#### Waiting Lists: Processing of Applicants

---

##### 20 Day Rule

Notification of the placement on a waiting list must be given within twenty (20) days of their visit to the local agency during clinic office hours to request benefits.

---

##### Waiting List

Information which shall be collected for each applicant on the waiting list according to Federal Regulations includes:

- Name
- Address
- Telephone Number (if applicable)
- Status (e.g.; pregnant, breastfeeding, age of applicant)
- Date placed on waiting list

All of the above information as well as spaces for the priority and the applicant's age are on the "Arizona CSFP Program Waiting List Notification." After it is completed, one needs to be given to the applicant as one needs to be placed in the waiting list file.

Optional information may include information which will assist in determining the approximate date on which the person may become categorically ineligible such as date of birth, actual delivery date of baby, or estimated delivery date.

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## Chapter Two

### Certification Standards and Procedures

---

#### Section J3

#### Waiting Lists: Program Considerations

---

##### Files

The State agency suggests the following system. If a local agency wants to adopt a different system, it should be one that meets the same standards of easy retrievability of all records and guaranteeing that applicants and participants are served fairly throughout the agency.

A separate filing system shall be set up for the waiting list. A separate section for each priority, which is closed, should be a file. A copy of the "Arizona WIC/CSFP Programs Waiting List Notification" shall be placed in the file in chronological order with the form with earliest date of placement on the waiting list first.

If the screening process has begun, any paperwork completed thus far (e.g., Consent/Release Form) shall be firmly attached to the copy and placed in the appropriate priority.

When that specific priority is reopened, the applicant with the earliest date of placement on the waiting list is the first to be notified, the second earliest date is notified, and so on.

These files should be accessible and clearly labeled for management and audit purposes.

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*Continued on next page*

## Chapter Two

### Certification Standards and Procedures

---

#### Section J3

#### Waiting Lists: Program Considerations (Continued)

---

<b>Notification/Recall from Waiting List</b>	<p>Notification of any changes may be completed by telephone or mail. Documentation shall include the date notified and the form of contact (i.e.; letter or phone).</p> <p>If notification is mailed, the postcard or letter will state either:</p> <ul style="list-style-type: none"><li>• An actual appointment date to be screened with a notice to contact the office if they do not want to or are unable to keep the appointment, or</li><li>• A date by which the person must contact the office to make an appointment.</li></ul> <p>The notification form shall contain a statement that the person shall be moved to the bottom of the waiting list if they do not respond to the notification.</p>
<b>Date of Ineligibility</b>	<p>The date of perceived ineligibility may be written on the “Arizona CSFP/CSFP Programs Waiting List Notification” to aid in file management. For example, if a child will reach his/her sixth birthday soon, the file could be terminated on the birth date if the priority remained closed.</p>
<b>False Expectation</b>	<p>The CSFP staff person should always explain why placement on the waiting list is necessary, and what it means in terms of realistic possibilities of receiving benefits.</p> <p>The Local Agency Director should provide training and scripts for staff to help them perform this task comfortably. For a sample, see Appendix E.</p>
<b>Referrals to Other Programs</b>	<p>Applicants who are placed on a waiting list should be referred to other appropriate programs; e.g., food assistance programs such as WIC (where available), Head Start, etc.</p>

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*Continued on next page*

## Chapter Two

### Certification Standards and Procedures

---

#### Section J3

#### Waiting Lists: Program Considerations (Continued)

---

##### Reassessment

At the end of the person's current certification period, the person will be reassessed and one or more of the following appropriate actions taken:

- Placed on the program if they qualify for an open priority
  - Placed on the waiting list if they qualify for a closed priority if the person requests placement
  - Graduated
  - Terminated if found ineligible
  - Referred to other appropriate programs
- 

##### Options for Participation

A person may be on the waiting list for WIC and CSFP at the same time. A person may receive benefits from one program while being on the waiting list for the other program. However, under no circumstances can a person receive both WIC and CSFP benefits in the same month. A participant's ID number will be the same for both programs.

---

##### Notification of Referral Agencies

Agencies which refer applicants to the CSFP Program shall be kept informed of any actions taken by the local agency to adjust caseload. This may include identifying categories of applicants still being served and should include encouragement to those agencies to keep making the referrals to the CSFP Program. Referring agencies should be aware that even when some people are not being served, others may be eligible to receive benefits immediately. See sample letter in Appendix D.

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## Chapter Two

### Certification Standards and Procedures

---

#### Section K

#### Transfer of Certification

---

##### **ID Folder/ Transfer Card**

At certification, each CSFP participant is given a completed Arizona CSFP program identification (ID) folder/transfer card stamped with an Arizona CSFP program seal. The participant can use this document to transfer between local agencies within Arizona or to other State CSFP programs.

Local agencies receiving transfers will accept these items as verification of certification the Arizona CSFP Program identification folder/transfer card or verification of certification (VOC) documents from other states. A document containing the following information is to be considered a valid VOC:

- Name of participant
- Beginning date of certification
- Date of income determination
- Date certification expires
- Signature and printed/typed name of the certifying local agency official
- The name and address of the certifying local agency
- An identification number or other means of accountability
- Migrant status as appropriate.

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## Chapter Two

### Certification Standards and Procedures

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#### Section K

#### Transfer of Certification (Continued)

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##### **Incomplete Verification of Certification**

A partially complete VOC will be considered proof of CSFP eligibility if it contains the following information:

- Name of participant
  - Date of certification
  - Date the certification period expires
  - Name and address of the certifying local agency
- 

##### **Retention of VOC**

Local agencies will retain the VOC from the transferring agency in the daily or central file.

---

##### **Transfer When a Waiting List Exists**

An individual transferring into a local agency will be allowed to participate (unless there is a waiting list for all priorities) until the designated end of her/his current certification period.

Local agencies that have waiting lists will

- Place transferring participants at the top of the list and enroll them before any other person; or
  - Enroll transfer participants immediately if some priorities are being served.
- 

*Continued on next page*

## Chapter Two

### Certification Standards and Procedures

---

#### Section K

#### Transfer of Certification (Continued)

---

##### Transfers (Valid Cert)

Transferees who contact a Local Agency requesting services and who are currently in a valid certification period shall be placed on the program immediately or at the top of the waiting list if the program is not enrolling new applicants. The transferee is placed on the waiting list ahead of all waiting applicants regardless of the priority under which he/she was initially certified. The transferring participant must then be enrolled before any other person.

Documentation of valid certification shall be a verification of certification (VOC) card which includes:

- The name of the participant
- The date the certification was performed
- The date the income eligibility was last determined
- The date the certification period expires
- The signature and printed or typed name of the certifying Local Agency official
- The name and address of the certifying Local Agency
- An identification number or some other means of accountability

Note: However, participants who arrive in a new service delivery area and show an incomplete VOC card which contains a minimum of the name, certification date, and expiration date should be treated just as if the VOC card contained all the information. The local agency would have to call the original agency to verify if food instruments had been issued within the last thirty days.

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*Continued on next page*

## Chapter Two

### Certification Standards and Procedures

---

#### Section K

#### Transfer of Certification (Continued)

---

**In-State Transfers** For transfers within the Arizona CSFP Program:

The local agency to which the participant is transferring to will:

- Verify active status in the AIM System, if a transferring person does not present with a valid VOC. Lost documents should be noted in the notes section of the Family Info screen of the AIM system.
  - Complete the In-State Transfer screen of the AIM system;
  - Retain the Arizona CSFP program ID Folder and Transfer Card which is the verification of certification (VOC) in the daily or central file and issue a new one from the current agency.
- 

**Out-of-State Transfers**

For out-of-state transfers within a valid certification, complete the Out of State Transfer screen of the AIM system and retain the VOC in the daily or central file. For out-of-state transfers outside a current certification, complete as a new certification.

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*Continued on next page*

## Chapter Two

### Certification Standards and Procedures

---

#### Section K

#### Transfer of Certification (Continued)

---

##### Transfers in of Migrants and Native Americans

Local agencies will make every effort to ensure the continuation of benefits to migrants, their families, and to Native Americans.

Local agency transfer of certification procedures will be developed and documented by the local agency policy and procedure manual to indicate:

- Identification of transferring migrants, their families, and
- The procedures which will be used to transfer their certification expeditiously.

Note: In the event that a local agency has a waiting list, transferring migrants, their families and Native Americans will be given priority for services.

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## Chapter Two

### Certification Standards and Procedures

---

#### Section L

#### Participant Disqualification for Program Fraud/Abuse

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Definition	<p>An attempt to commit or the commission of program abuse shall result in disqualification from the CSFP program for a period not to exceed ninety (90) days. The following are some examples of program abuse. The State agency reserves the right to suspend participants for other actions not listed here if the participants violate program rules.</p>
Disqualification Without Warning	<p>These serious violations of program integrity shall result in disqualification without any verbal or written warning:</p> <ul style="list-style-type: none"><li>• Abusive behavior toward health or food bank staff</li><li>• Use of foul language</li><li>• Threats of physical violence</li><li>• Selling CSFP food</li><li>• Stealing CSFP food</li><li>• Knowingly and deliberately misrepresenting any information or circumstances to obtain benefits, e.g. misrepresentation of identity, income, residence, family size, health status, pregnancy or date of birth</li><li>• Knowingly receiveing CSFP benefits in more than one location and/or receiving WIC and CSFP benefits in the same month.</li><li>• Verbal / Physical abuse, threat or otherwise causing a disruption at the a CSFP clinic or distribution site documented by the unit supervisor</li></ul>

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## Chapter Three

### Caseload Management & Outreach

---

#### Overview

---

##### Policy

The State agency will prepare a written plan specifying the objectives, methods and evaluation of CSFP outreach efforts. The plan will include coordination of activities between local agencies and outreach/referral agencies.

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E	Volunteers	11
Appendix A	Forms	Appendix A

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## **Chapter Three**

### **Caseload Management & Outreach**

---

#### **Section A**

#### **Caseload Management**

---

##### **Program Expansion**

The State of Arizona will work with local agencies to maintain the currently authorized USDA caseload.

---

##### **Geographic Areas Served**

The geographic area currently served by CSFP in Arizona consists of following counties: Apache, Cochise, Coconino, Gila, La Paz, Maricopa, Mohave, Pima, Pinal, Santa Cruz, Yavapai, Yuma. This area consists of approximately 80,000 square miles and includes area of dense and sparse populations.

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## Chapter Three

### Caseload Management & Outreach

---

#### Section B

#### Outreach – Overview

<b>Procedure</b>	All local agencies will develop outreach/referral procedures, which comply with the State Agency's Outreach Plan.
<b>Objectives of outreach</b>	<p>The objectives of CSFP outreach efforts are:</p> <ul style="list-style-type: none"><li>• To inform eligible persons of the availability of the CSFP program including the eligibility criteria for participation and the location of CSFP services;</li><li>• To target outreach toward physicians/hospitals in order to increase enrollment of high risk participants;</li><li>• To increase the number of migrants/agricultural workers enrolled in CSFP.</li></ul>
<b>Methods of outreach</b>	<p>Agencies, offices and organizations (including minority organizations serving or having access to eligible persons) will be contacted at least annually.</p> <p>Brochures describing CSFP services, eligibility criteria, and location of local agencies will be distributed to outreach agencies that serve or have access to the program's target population.</p> <p>Outreach agencies include, but are not limited to: AHCCCS providers and private physicians, IHS facilities, dental services, EPSDT, family planning services, alcohol and drug abuse counseling agencies, child protective services, child abuse counseling agencies, immunization providers, prenatal and postnatal care providers, well child programs, CACFP providers, the Food Stamp Program, EFNEP, TANF, SSI, hospitals and clinics, welfare and unemployment offices, schools, social service agencies, food banks, other food assistance programs (FDD, FDPIR, etc.), homeless shelters, child support enforcement services, foster care agencies, farm worker and migrant/agricultural worker compensations, agencies who serve children with special health care needs, and religious community organizations in low-income areas.</p>

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*Continued on next page*



## Chapter Three

### Caseload Management & Outreach

---

#### Section B

#### Outreach – Overview (Continued)

---

##### Emphasis of outreach

Emphasis will be placed on reaching potential participants who are:

- Migrant and agricultural workers
- Pregnant women, especially teens and women in the early months of pregnancy
- Recipients of TANF or Food Stamps
- Senior Centers participant
- Participants in the Child and Adult Care Food Program (CACFP)
- Women enrolled in substance abuse programs
- Persons enrolled in the Arizona Health Care Cost Containment System (AHCCCS)
- Minority and immigrant populations
- Homeless individuals
- Children under the care of foster parents, protective services and child welfare authorities

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*Continued on Next Page*

## Chapter Three

### Caseload Management & Outreach

---

#### Section B

#### Outreach – Overview (Continued)

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<b>Outreach Team</b>	An Outreach Team composed of State agency staff and local agency staff will meet at least quarterly to coordinate CSFP program operations and to direct statewide outreach efforts.
<b>Coordination with Anti-Hunger Groups</b>	The State Agency will meet with and encourage local agency participation with hunger advocates, food bank representatives and others interested in supporting CSFP. Staff will actively participate in the Arizona Advisory Council on Hunger.
<b>Announcement of CSFP Services</b>	The State agency will announce the availability of CSFP services to the public annually using statewide media.
<b>Development of materials</b>	The State agency will obtain or help develop outreach materials for local agencies to assist in their outreach efforts.
<b>Guidelines for Outreach</b>	<p>The Outreach Team will establish procedures and guidelines to assist local agencies in developing or expanding referral systems and outreach plans.</p> <p>State and local agency files of outreach agencies contacted will include (as applicable) agency name, address, phone number, hours, CSFP eligibility requirements, contact person(s), service area, and services of each agency.</p> <p>Uniform CSFP information materials announcing program benefits will include a program description, eligibility criteria, location of local projects, and non-discrimination statement.</p>

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*Continued on next page*

## Chapter Three

### Caseload Management & Outreach

---

#### Section B

#### Outreach – Overview (Continued)

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**Monitoring Local Agency Activity**

The State agency will monitor outreach activities at each Management Evaluation.

---

**Outreach Activities**

Each local agency will contact agencies, offices, and organizations (including minority organizations) serving or having access to eligible persons in the local service area annually. Each agency will be supplied with a description of CSFP services, eligibility criteria, and location of local agency clinics.

---

**Announcement of CSFP Service**

Each local agency will announce the availability of CSFP services to the public annually, using media, which will reach potential clients in their service area.

---

**Outreach Log**

The State and local agencies will maintain a file recording all statewide outreach activities. Suggested outreach logs format follows.

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*Continued on next page*

## Chapter Three

### Caseload Management & Outreach

---

#### Section B

#### Outreach – Overview (Continued)

---

##### Sample Outreach Log

Outreach Log FY____				
Date	Staff Name	Organization Contacted	Type of Contact	Result
1/6/06	Ima Great, CNW	Concordia Valley High School Attn: Joan Doe Phoenix, AZ 85000	Mailed Outreach packet	Potential to reach 100 pregnant and/or parenting teens.

##### Description of Log Entries

Date = date outreach activity completed

Staff Name = staff member who did the outreach

Organization = person/group who received information

Type of contact = e.g., mailed information, radio interview, press release, public presentation, staffed booth at health fair

Result = e.g., potential number of clients reached, and the description of those clients.

---

## **Chapter Three**

### **Caseload Management & Outreach**

---

#### **Section C**

#### **Outreach – Evaluation**

---

The Local Agency files of outreach activities will be updated annually.

The State Agency CSFP Manager and the Local Agency CSFP Director will evaluate the effectiveness of outreach efforts.

---

## Chapter Three

### Caseload Management & Outreach

---

#### Section D

#### Homebound Elderly

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**Certification** Local agencies shall accommodate the needs of the homebound elderly with homes-based certification as well as food delivery.

Procedures for certifying the applicant are the same for homebound as the general population.

---

**Referrals** Upon certification, the homebound elderly should receive information on the following programs:

- Medical Providers
- County Health Department Services
- Food Stamps or other food programs
- Social Services Agencies
- Temporary Assistance to Needy Families (TANF)
- Expanded Food and Nutrition Education Program (EFNEP)
- Counseling Services
- Medicare Services

---

**Nutrition Education** Upon certification, nutrition education needs to be given. This education can be related to:

- Proper nutrition in relation to total concept of good health; or
- Obtaining a positive change in food habits, resulting in improved status and in the prevention of nutrition-related problems through maximum use if the supplemental and other nutritious foods.

## Chapter Three

### Caseload Management & Outreach

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#### Section D1

#### Homebound Elderly – Food Delivery

---

##### Policy

Food boxes for the homebound elderly shall be pre-boxed and delivered.

---

##### Procedure

The following procedure shall be used:

- The person responsible for the delivery of the box shall sign the Home Delivery Form.
  - Upon delivery, the participant shall sign the Home Delivery Form to verify the delivery has been made.
  - The signed form and any undelivered boxes shall be returned to the Food Bank. All undelivered food boxes should be registered as such on the Home Delivery form and returned to inventory.
-

## Chapter Three

### Caseload Management & Outreach

---

#### Section E

#### Volunteers

---

##### Policy

Local agencies may recruit, train, and manage volunteers.

Volunteers may be used for tasks related to certification and enrollment and food delivery, such as transportation of food boxes to homebound elderly participants and assembling and/or distributing food boxes.

Volunteers may not transport homebound elderly participants to food package pickup sites.

---

##### Confidentiality

Volunteers will be instructed on and required to sign a statement of confidentiality before tasks may be assigned. These statements will be kept on file and available upon request.

Note: A copy of the CSFP Statement of Confidentiality is located in Appendix A: Forms.

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## **Chapter Three**

### **Caseload Management & Outreach**

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#### **Appendix A**

## Chapter Four

### Nutrition Education

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#### Overview

---

#### Introduction

Education is an integral part of the CSFP program. This chapter covers nutrition education.

---

#### Contents

Section	Title	Page Number
A	Program Education for Participants	2
B	Nutrition Education for Participants	3
C	Evaluation	5
D	Education for Staff	6
E	Nutrition Education Resources	8
Appendix A	Forms	Appendix A

---

## Chapter Four

### Nutrition Education

---

#### Section A

#### Program Education for Participants

---

##### Certification

At certification, participant education will consist of:

- An explanation of CSFP rules and regulations, participant responsibilities, and available foods
  - Emphasis will be placed on the relationship of proper nutrition to promote optimum health and the positive, long-term benefits of nutrition education. Local agency staff will encourage participants to attend and participate in nutrition education activities such as cooking demonstrations
  - Local agencies will prepare a listing of agencies that provide social services available to all applicants. The referral list must be provided to each participant/family at the beginning of each certification period. A copy of the listing will be maintained on file and will be updated annually
- 

##### Proxies

When a proxy picks up drafts for a participant, the proxy must be given an explanation of her/his responsibilities under CSFP rules.

---

##### Waiting Room

The area in the clinic that is used for participants to wait for their CSFP appointments needs to promote a learning environment.

Materials that are displayed should have a health education or civil rights message.

The use of televisions and video players will be for educational programs. This would include looped educational videos, individual videos or other programs that discuss nutrition, health or safety related topics.

---

## Chapter Four

### Nutrition Education

---

#### Section B

#### Nutrition Education

---

##### Policy

Nutrition education will be designed to:

- Explain the importance of the consumption of the supplemental foods by the participant for whom they are prescribed, rather than by other family members
  - Reference any special nutritional needs to participants and ways to provide adequate diets
  - Explain that this program is supplemental rather than a total food program
  - Inform on the use of the supplemental foods and on the nutritional value of these foods
  - Inform on the benefits of breastfeeding, if applicable
  - Explain the importance of health care
- 

##### Basis of Education

Nutrition education will be provided to all CSFP participants based on the protocols developed by the Office of Chronic Disease Prevention and Nutrition Services (OCDPNS), Arizona Department of Health Services (ADHS) and other accepted nutrition authorities.

---

##### Nutrition Education Contact

Verbal communication includes individual or group interaction between CSFP staff and participants, such as discussions, summaries, and question and answer periods.

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*Continued on next page*

## Chapter Four

### Nutrition Education

---

#### Section B

#### Nutrition Education (Continued)

---

**Education  
Contacts /  
Certification  
Period**

Local agencies will provide appropriate nutrition education to all participants. During each 6 month certification period, the CSFP participant will receive at least one (1) nutrition education contact which impacts the participant/family's nutritional status.

---

**Documentation  
of Education**

Local agency staff will document in the Notes Section of the Cert Action Screen in the AIM system the nutrition education provided.

---

## **Chapter Four**

### **Nutrition Education**

---

#### **Section C**

#### **Evaluation**

##### **Participant Satisfaction Survey**

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A statewide CSFP participant satisfaction survey was conducted in April, May, and June of FY2004.

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## Chapter Four

### Nutrition Education

---

#### Section D

#### Education for Staff

---

##### Ensuring Competence

Local agencies will ensure competence of all paraprofessionals who certify or prescribe food packages for CSFP participants. Qualified Local Agency staff will train paraprofessionals as CSFP Certifiers, using the Arizona CSFP Program Training Manual.

---

##### Staff Evaluation

Local agencies will evaluate staff performance annually. The supervisor will complete an annual evaluation of each employee. The completed employee evaluation will be maintained in the employee's file.

---

##### Education Plan

Local agencies shall provide forty-eight (48) hours of documented training for each staff member in each fiscal year. Training does not have to be evenly dispersed over the four quarters of the fiscal year, but some level of training shall be conducted each quarter.

At least thirty-six (36) hours of nutrition education will be in the identification of, understanding of, education about, and documentation of nutrition risks.

An additional twelve (12) hours of CSFP related education shall be provided. At this time it is required that staff receive at least one training that addresses Civil Rights and may also include other topics such as program rules, food instrument issuance, referral procedures, computer skills, customer service and safety (car seat, personal, and kitchen).

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*Continued on next page*

## Chapter Four

### Nutrition Education

---

#### Section D

#### Education for Staff (Continued)

---

##### Agency Training Files

Each local agency will maintain a record of all continuing education provided in a central file.

Central training files will include:

- Agenda, outline and teaching materials used for local in-service training provided, along with a list of participants, speakers, date and time spent in training;
  - Agenda and outline of meetings which local agency staff attends (e.g., Annual Nutrition Education Conference, Statewide Staff Meetings).
- 

##### Documentation of Training

Documentation consists of a list of dates, topics presented and time spent in training. Date and time summaries should be separated by fiscal year in order to verify that the required forty-eight (48) hours per year have been provided. Documentation can also include:

- Copies of pre-and post-tests or other methods of evaluation;
- Documentation of follow-up training, when required (e.g., if competency is not met).

Note: The name of the workshop or in-service training is sufficient when the agenda and training outline are retained in the local agency training file.

---



## Chapter Four

### Nutrition Education

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#### Section E

#### Nutrition Education Resources

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**Brochures**

For a copy of each brochure, refer to the State Pamphlet Resource Catalog. To order, refer to the current CSFP Order Form in Appendix C.

---

**Care Plan**

It is strongly encouraged that the care plan available through the AIM system is used to support nutrition education.

---

**Training Manual**

Arizona CSFP Program Training Manual for the AIM system.

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**Dietetic  
Education  
Program**

The Dietetic Education Program (DEP) is a two-year college program approved by the American Dietetic Association for the training of dietetic technicians in the delivery of nutrition care services. Graduates of the program receive an Associate of Applied Science degree from Central Arizona College.

- DEP utilizes competency based self-paced modules and is available to local CSFP agencies for the training of paraprofessionals.
  - Local agencies may provide paid time for employees to work on DEP modules or group time for DEP classes. This time, when documented, applies to the 48 hours of continuing education required per employee each year.
  - The State agency **may** fund full or partial tuition for local agency staff when requested.
-

## Chapter Five

### Food Delivery and Distribution

---

#### Overview

---

##### Introduction

Commodities are purchased and delivered to food distribution sites. Those sites must have policies and procedures to retain the quality of the food as well as distribute correctly. Distribution procedures and reporting requirements for the commodities are also included.

---

##### Contents

Section	Title	Page Number
A	Commodities	2
B	Food Delivery - Receiving	3
C	Food Delivery - Inventory	4
D	Food Distribution – St. Mary's/Westside Food Bank Alliance	5
E	Food Distribution – Community Food Bank	8
F	Reporting	10

---

## Chapter Five

### Food Delivery and Distribution

---

#### Section A Commodities

---

##### Ordering

The CSFP Manager will develop quarterly food orders based on:

- Current Inventories
- Commodities ordered but not received
- Participation
- Community Preferences
- Available storage space
- Timing of deliveries

Note: Quarterly Food Order Spreadsheet is used to ensure correct ordering process. (Response to the Quarterly Round Surveys posted by ECOS)

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##### Cancellations

When products are no longer available, substitutions will be requested.

---

##### Notification

Each food distribution agency will be notified of the type and quantity of food as well as approximate receiving date.

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## Chapter Five

### Food Delivery and Distribution

---

#### Section B

#### Food Delivery - Receiving

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<b>Delivery Driver</b>	Not required to assist with the unloading of the truck.
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<b>Arrival</b>	<p>The receiving food distribution site staff shall:</p> <ul style="list-style-type: none"><li>• Log the receipt of all incoming shipments and report all shortages. Shortages are to be reported to KCCO on the KC-269A Form.</li><li>• Inspect all merchandise, as it is unloaded.</li><li>• Refuse items that are damaged and not fit for Human Consumption.</li><li>• Forward the original commodity receipts to the State Agency by the 15<sup>th</sup> of the month.</li></ul>
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<b>Questionable Conditions</b>	<p>Prior to the signing of the bill of lading, contact the State CSFP Manager by e-mail for permission to refuse. If granted, note on bill of lading the reason for refusal of shipment.</p> <p>After the signing of the bill of lading, if damaged or poor condition of products is discovered, contact the State CSFP Manager by e-mail for permission to return or discard.</p>
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## Chapter Five

### Food Delivery and Distribution

---

#### Section C

#### Food Delivery - Inventory

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<b>Policy</b>	All possible efforts shall be made to ensure the integrity of the commodity foods.
<b>Guidelines</b>	<p>The receiving food distribution site shall:</p> <ul style="list-style-type: none"><li>• Warehouse CSFP commodities separate from other items</li><li>• Store food to maintain its safety and integrity according to USDA standards</li><li>• Use a secure facility approved in accordance with USDA warehousing standards</li><li>• Distribute foods in the order that they were received (first in, first out)), unless otherwise directed by State CSFP Manager</li><li>• Maintain documentation of all food distributed, used for educational purposes, or deemed a loss</li><li>• Conduct an annual physical inventory in cooperation with the CSFP Manager</li><li>• Maintain adequate insurance (Proof required annually)</li></ul>
<b>Inventory Reporting</b>	<p>Monthly, each food distributor must provide the State Office with the following:</p> <ul style="list-style-type: none"><li>• A version of the FNS 153 showing all receipts and distributions as part of this process. This includes beginning inventory (which matches last month ending inventory), all food received during the month, distribution by W/C elderly categories, all food losses, total activity, and positive or negative adjustments.</li><li>• Losses and the reason for each loss is documented and inventory adjustments are explained and included. If an inventory loss is greater than \$200.00, a letter of explanation is required from the food bank as well as the planned corrective action, to prevent reoccurrence.</li></ul>

## Chapter Five

### Food Delivery and Distribution

---

#### Section D

#### Food Distribution – St. Mary's/Westside Food Bank Alliance

---

##### Service Area

The St. Mary's Westside Food Bank Alliance (WSFB) will receive direct shipments of commodities at its Phoenix warehouse for participants who reside in:

- Coconino County
- La Paz County
- Mohave County
- Pinal County
- Maricopa County
- Gila County
- Yavapai County
- Cochise County
- Navajo County
- Santa Cruz County
- Yuma County
- Apache County

Note: WSFB will bear all cost associated with delivery of food boxes.

##### Distribution

Participants in Maricopa County may receive their food box via the self-service method.

All participants in the other counties served by the St. Mary's Westside Food Bank Alliance will receive pre-packed food box, unless otherwise authorized by the Arizona Department of Health Services (ADHS).

Homebound Elderly will receive their food box via the home delivery method.

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*Continued on next page*

## **Chapter Five**

### **Food Delivery and Distribution**

---

#### **Section D**

#### **Food Distribution – St. Mary’s/Westside Food Bank Alliance**

#### **(Continued)**

---

##### **Self-service Delivery**

The following procedure will be used:

1. Participant, authorized representative, or proxy will check in at entrance station and present their CSFP identification card to confirm that they are in a valid certification.
2. Valid participants will be issued a “Shopping List” with the quantities of eligible foods listed.
3. Participants will then select from available stock.
4. Participants will proceed to the computerized bar code reader. The reader verifies the items and quantities authorized and received.
5. The reader prints a receipt for the food that is then signed by the participant, authorized representative, or the proxy.

##### **Tail-gate Delivery**

---

St. Mary’s Westside Food Bank Alliance will transfer the appropriate amount of prepackaged food boxes for monthly distribution to its authorized distribution sites.

The receiving agency will sign the receipt and return it to the St. Mary’s Westside Food Bank Alliance.

The following procedure will be used at the distribution site:

1. The participant, authorized representative, or proxy will come to the distribution site with the CSFP identification card to confirm that they are in a valid certification.
  2. Staff or volunteers will issue appropriate food box for their category.
  3. Participant, authorized representative, or proxy will sign standard form as verification of receipt of food box.
  4. Forms will then be sent to the St. Mary’s Westside Food Bank Alliance.
-

## **Chapter Five**

### **Food Delivery and Distribution**

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*Continued on next page*

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#### **Section D**

#### **Food Distribution – St. Mary’s/Westside Food Bank Alliance**

#### **(Continued)**

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##### **Home Delivery**

The following procedure will be used:

1. The person responsible for the delivery of the food boxes will sign the Home Delivery Form.
  2. Upon delivery the participant will sign the Home Delivery Form to verify they have received the box.
  3. The signed form and all undelivered boxes will be returned to the St. Mary’s Westside Food Bank Alliance.
-



## Chapter Five

### Food Delivery and Distribution

---

#### Section E

#### Food Distribution – Tucson Community Food Bank

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<b>Service Area</b>	The Tucson Community Food Bank (TCFB) shall receive direct shipment of commodities for the participants of Pima County.
<b>Distribution</b>	<p>Women, children, and non-homebound elderly may be offered a self-service model of delivery, except in Arivaca Continental and Benson.</p> <p>Participants in Arivaca, Continental, and Benso will receive pre-packed food boxes.</p> <p>Homebound elderly will be offered home delivery.</p> <p>Note: TCFB will bear all cost associated with the delivery of food boxes.</p>
<b>Self-service Delivery</b>	<p>The following procedure will be used:</p> <ol style="list-style-type: none"><li>1. Participant, authorized representative, or proxy will check in at entrance station and present their CSFP identification card to confirm that they are in a valid certification.</li><li>2. Valid participants will be issued a "Shopping List" with the quantities of eligible foods listed.</li><li>3. Participants will then select from available stock.</li><li>4. When done, the participant will proceed to the check-out station where a CSFP staff or designee will tally foods.</li><li>5. The participant will sign the tally sheet to verify receipt of the food.</li></ol>

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*Continued on next page*

## Chapter Five

### Food Delivery and Distribution

---

#### Section E

#### Food Distribution – Tucson Community Food Bank (Continued)

---

##### **Tail-gate Delivery**

TCFB will transfer the appropriate amount of prepackaged food boxes for monthly distribution to its authorized distribution sites.

The receiving agency will sign the receipt and return to TCFB.

The following procedure will be used:

1. The participant, authorized representative, or proxy will come to the distribution site with the CSFP identification card to confirm that they are in a valid certification.
  2. Staff or volunteers will issue appropriate food box for category.
  3. Participant, authorized representative, or proxy will sign standard form as verification of receipt of food box.
  4. Forms will then be sent to TCFB.
- 

##### **Home Delivery**

The following procedure will be used:

1. The person responsible for the delivery of the food boxes will sign the Home Delivery Form.
  2. Upon delivery the participant will sign the Home Delivery Form to verify they have received the box.
  3. The signed form and all undelivered boxes will be returned to TCFB.
-

## Chapter Five

### Food Delivery and Distribution

---

#### Section F Reporting

---

##### Local Agencies

Local agencies will report participation by category and inventory (remaining food) status to the appropriate food bank monthly.

---

##### Food Banks

Food banks will report participation by category and inventory status to the state agency monthly by no later than the 15<sup>th</sup> of each month..

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# Chapter Six

## Audits and Management Evaluation

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### Overview

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#### Policy

The State of Arizona Auditor General will conduct an annual, independent, agency-wide audit in compliance with OMB Circular A-133 annually for the Arizona Department of Health Services (ADHS), MOST County Health Departments, with other non-profit agencies covered by certified public accounting firms.

Non-federal entities (subrecipients) that expend \$ 300,000 or more a year in federal awards must have a single audit conducted that year and annually. The subrecipients receiving federal funds through ADHS will provide an independent, agency-wide audit in accordance with OMB Circular A-133 to ADHS.

The ADHS-OCDPNS Audit Staff will perform contract compliance audits of expenditures pursuant to OMB Circular A-87 (Governmental Subdivisions), OMB Circular A-122 (Non-Profit Organizations), ADHS Accounting and Auditing Procedures Manual, and CSFP Consolidated Regulations (7 CFR Ch. II Part 247)

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#### Contents

This chapter is divided into four (4) sections, which detail procedures and audit policies, and one (1) appendix.

Section	Title	Page Number
A	Procedures	2
B	Audit Records & Policies	6
C	Management Evaluations	8
D	Management Evaluations - Procedures	9
Appendix A	Forms	Appendix A

---

## Chapter Six

### Audits and Management Evaluation

---

#### Section A Procedures

---

##### Notification of Audit

CSFP monitoring and review of agencies are scheduled annually. Management evaluations for a contractor (local agency or food bank) will be completed by the OCDPNS. There are exceptions to this schedule including Management requested reviews, previous audit follow-up, USDA sponsored special studies, or agency-requested support.

The ADHS-OCDPNS staff will notify the local agency or food bank of the audit 4 to 6 weeks in advance of the audit. Copies of the notice with a detailed questionnaire are maintained.

Telephone verification of the audit date, time, and the auditor's name is made approximately two (2) week prior to the audit.

The local agency is responsible for notifying its subcontractor as appropriate.

---

##### Pre-audit Conference with State Personnel

The CSFP Manager is contacted prior to the audit to discuss problem areas that may be identified in the contract files correspondence and reports, information available from management, CSPF monitoring reports, and pertinent single audit results. Program progress reports may be obtained at this time.

Copies of the Expenditure Reports covering the period of the audit are obtained, summarized, and purchase orders covering the audit period are copied and reviewed.

---

##### Entrance Interview

An entrance conference will be held involving the audit staff and local agency officials for the purpose of outlining the scope of the audit and setting up tentative schedules of work to be performed.

---

##### Audit of Financial Records

The objective of an audit is to determine propriety and eligibility of expenditures pursuant to OMB Circular A-87 and 122, ADHS Accounting and Auditing Manual, and the CSFP contracts in effect.

In the event the local agency or food bank has subcontracts, the subcontractors' records may, if circumstances dictate, also be examined.

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*Continued on Next Page*

# Chapter Six

## Audits and Management Evaluation

---

### Section A

#### Procedures (Continued)

---

##### **Audit of Financial Records (Continued)**

Auditors may review the following:

- Approved cost allocation plan
  - Adequacy of the accounting system
  - CSFP funds separately accounted for
  - Reconciliation of local agency's expenditure report with the local agency's books
  - Detail testing of transactions including salaries and wages, fringe benefits, supplies, indirect cost pools, and expenditure reasonability. Statistical sampling will be used, with expanded sampling in problem areas.
  - Results of previous corrective action plan and level of compliance
  - Any other records deemed necessary to ensure Program compliance
- 

##### **Audit of Performance Records**

An audit of the local agency's performance records is conducted to examine and verify the units of service provided and reported as specifically authorized in the contract. The audit is not an evaluation of the quality of those services.

Statistical sampling techniques may be utilized to determine the specific units of service to be reviewed. Subcontractors' performance records may also be examined.

Auditors may review the following:

- Client charts and/or files
- Activity logs
- Documentation in support of program progress reports
- Sign-in sheets
- Any other records deemed necessary to ensure Program compliance

Note: Medical case records of the individuals will not be reviewed unless they are the only source of certification data. All client records examined by the ADHS audit staff will be treated with complete confidentiality.

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*Continued on Next Page*

## Chapter Six

### Audits and Management Evaluation

---

#### Section A

#### Procedures (Continued)

<b>Exit Conference</b>	Upon completion of the audit, an exit conference will be held with the local agency's program director and finance officer to review the audit findings. Recommendations for corrective measures for adverse audit findings will be made by auditors at this time. Once the audit report is received, the final recommendations will be made by the CSFP Manager.
<b>Post-audit Conference</b>	Prior to writing the audit report, the audit findings will be discussed with the local agency CSFP Director.
<b>Audit Report</b>	The audit staff gives the audit report to the Office of Local Health Services who distributes it for comments to the State Controller, the CSFP Manager, and the Accounting Office.
<b>Audit Follow-Up</b>	<p>The CSFP Manager is responsible for reviewing the audit recommendations to determine what specific action should be taken and will set deadlines for implementation of corrective measures.</p> <p>The CSFP Manager is responsible for forwarding a copy of the report and recommendations to the local agency. The local agency will reply in writing as to what corrective action will be taken to satisfy each audit recommendation.</p> <p>The CSFP Manager will evaluate the corrective actions taken by the local agency and will then reply to the ADHS Office of Auditing. The reply should include the findings, the recommendations, the local agency's responses and the CSFP Manager's response.</p> <p>Upon receipt and acceptance of the audit response from the CSFP Manager, the audit file will be closed.</p> <p>The follow-up should be accomplished within 60 calendar days of the date of the audit report unless an extension date is justified and documented.</p>

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*Continued on Next Page*

## Chapter Six

### Audits and Management Evaluation

---

#### Section A

#### Procedures (Continued)

---

##### Monitoring

Audit recommendations which have been implemented by the local agency, will be monitored by the OCDPNS during review visits to the local agency.

---

##### Non-compliance

If the local agency is unable to, or does not agree to comply with the audit recommendations, the CSFP Manager and the ADHS auditor will meet with the local agency. This meeting should be held within 20 calendar days of receipt of the local agency's reply. The meeting participants should attempt to resolve any problems relating to the audit recommendations.

---



## Chapter Six

### Audits and Management Evaluation

---

#### Section B

#### Audit Records & Other Policies

---

##### Audit Records

State and local agencies will maintain records for 5 years and 5 months after the end of the federal fiscal year to which the reports pertain. Records must be easily retrieved for review during an audit.

The Secretary of Agriculture, the Comptroller General of the United States, or any of their duly authorized representatives, will have access to any books, documents, papers and records of the State and local agencies and their contractors for the purpose of making surveys, audits, examinations, excerpts, and transcripts.

---

##### No Smoking Policy

State and local agencies will establish mandatory no smoking policies in each CSFP clinic pursuant to the Federal Fiscal Year (FFY) 1994 Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act (Public Law 103-111).

---

##### Drug-free Workplace

State and local agencies will adhere to the rules and policies established pursuant to federal drug-free workplace mandates. 5 U.S.C. §7301, 41 U.S.C. § 701, and Presidential Executive Order No. 12564.

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*Continued on Next Page*

## Chapter Six

### Audits and Management Evaluation

---

#### Section B

#### Audit Records & Other Policies (Continued)

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##### Cost Allocation Guidelines

The contractor will assure that costs be deemed reasonable based on the following criteria:

- Reasonable and necessary to carry out the program
- Treated consistently
- Consistent and allowable under federal, state, and local laws, regulations and policies
- Be determined in accordance with generally accepted accounting principles and adequately documented
- Net of applicable credits
- Charged in the correct accounting period
- Not be charged to more than one federal grant of used to meet a matching or cost sharing requirement for more than one Federal Grant, either in the current or prior accounting period
- A cost that benefits the grant's objectives
- Costs allocated equitably in terms of benefits derived

##### Continuous Time Reporting

Continuous time reporting is the required documentation system because employees engaged in multiple programs or cost objectives must continuously generate documentation to support the distribution of their time and effort. Reference: OMB Circular A-87, Attachment B, paragraph 11.h.1-2, and A-122 Attachment B, Paragraph 7.m.1.

The only exceptions are governmental agencies, single cost objectives, and semi-annual certification indicating performance of work for one cost objective. Reference: OMB Circular A-87, Attachment B, paragraph 11.h.1-3.

## **Chapter Six**

### **Audits and Management Evaluation**

---

#### **Section C**

#### **Management Evaluation**

---

##### **Policy**

The State agency shall conduct monitoring evaluations of each local agency every other year. Such evaluations shall include on-site review. The State agency may conduct such additional on-site reviews as the State agency determines to be necessary in the interest of the efficiency and effectiveness of the program.

In addition, the State agency will make on-site visits to each local agency as needed.

The State agency shall develop a reporting process which includes: prompt notification of deficiencies to the local agency, timely development of corrective action plans, and the monitoring of local agency implementation of such plans.

The State agency shall require local agencies to establish management evaluation systems, quality assurance plans and/or continuous quality improvement plans to review their operations.

---

## Chapter Six

### Audits and Management Evaluation

---

#### Section D

#### Management Evaluations – Procedures

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The CSFP Manager will perform the management evaluation. This person is responsible for completing the following tasks:

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##### **Prior Notification**

Advise the local agency or food bank and the CSFP Director in writing of the dates and staff schedule for the monitoring visit. Mail and e-mail the Pre-monitoring survey (Appendix B) to the local agency Health Officer and copied to the local agency CSFP Director 30 days prior to the evaluation.

---

##### **Exit Interviews**

Conduct a meeting with the local agency CSFP Director, local agency staff, and monitoring staff at the end of the review. The lead person will explain the preliminary results, discuss questions and feedback, and give an approximate date for the written report to be sent.

---

##### **Written Findings Report**

Compile a written report using the pre-established format (see appendix) within 60 calendar days of the date of the exit interview. This time frame may be extended if arrangements are made prior to the evaluation and approved by the CSFP Manager. Mail the written report to the local agency or food bank with copies to the CSFP Director, the Office of Local Health, and the local agency file. The report will contain the date a corrective action plan must be submitted to the State agency.

---

# Chapter Seven

## Financial Management

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### Overview

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#### Policy

All CSFP program funds received by the Arizona Department of Health Services (ADHS) will be accurately documented and all expenditures made according to procedures set forth in the State of Arizona Accounting Manual.

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#### Contents

This chapter is divided into three (3) sections which detail state and local responsibilities and the Monthly Summary Report and one (1) appendix.

Section	Title	Page Number
A	State Responsibilities	2
B	Monthly Summary Report and Follow-Up	6
C	Local Agency Responsibilities	8
Appendix A	ADHS Procurement Rules and Regulations	Appendix A

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## Chapter Seven

### Financial Management

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#### Section A

#### State Responsibilities

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##### Overview

State agencies are required by statute to submit to the State Finance Division encumbrance documents. Encumbrance documents detail all proposed obligations for Outside Professional Services, In-State and Out-of-State Travel, and Capital Equipment.

In addition, it is the policy of ADHS that all proposed obligations of \$50.00 or more be encumbered. ADHS Accounting Office must confirm the availability of funds before encumbrances are submitted to the State Finance Division.

##### Outside Professional Services and Travel

Control of program funds expended for Outside Professional Services and Travel will be maintained by use of the Department Encumbering Procedures. These procedures are outlined in ADHS Procedures Manual, Section IV, Part 3 (see pages VI-5 through VI-13)

##### Personnel Services

Personnel are specifically assigned to established positions classified under the Uniform Classification Plan administered by the Personnel Division of the Arizona Department of Administration (ADOA).

Payroll charges for personnel assigned to those positions specifically identified in the Arizona CSFP Program will be charged against the appropriate State Administrative Budget and Cost Center.

The ADHS Payroll Section shall calculate all charges to Personal Services and Employee Related categories.

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*Continued on next page*

## Chapter Seven

### Financial Management

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#### Section A

#### State Responsibilities (Continued)

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##### Capital Expenditures

Requests for encumbrance for Capital Equipment, expenditures over \$1,000.00, and encumbrances of all other Program funds will be authorized by the Chief of the Office of Chronic Disease Prevention and Nutrition Services (OCDPNS), or the Nutrition Programs Manager, or their designee. After the purchase is completed, a copy of the vendor's invoice and an equipment inventory list will be submitted to the CSFP Manager.

---

##### Equipment Inventory

Documentation of items costing more than \$1,000.00 will be sent to ADHS Inventory Control. Inventory Control will assign an equipment number and add the item to the ADHS's Inventory Listing. An equipment number tag will be forwarded to the location of the equipment and permanently affixed to the item.

A computerized inventory listing is printed annually for each equipment location showing all equipment numbers, equipment description, cost, date acquired, and the source of funds, which purchased the equipment. In this way, property purchased with program funds can be distinguished from other property and inventoried annually.

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##### Contracts More Than \$10,000

State statutes require Requests for Proposals (RFP's), advertising, sealed bids, and contracts for all Outside Professional Services more than \$10,000.00. The State agency will comply with all provisions of ARS Title 41, Chapter 6.1, Sections 41-1051 as outlined in the ADHS Procedures, Section IV, Part 3.

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*Continued on next page*

## Chapter Seven

### Financial Management

---

#### Section A

#### State Responsibilities (Continued)

---

##### **Contractor's Expenditure and Requirements Report**

All Contractor's Expenditure and Requirements (CER) Reports will be signed by the Chief of OCDPNS, the NST Manager, or an individual specifically designated by the OCDPNS Chief. This signature certifies that the local agency's performance is satisfactory and that payment can be made according to that agency's contract.

ADHS reserves the right to withhold funds requested for advance payment in the event program reports are not received or other contract requirements are not being met. Funds can be withheld until such time as the reports are received or ADHS is satisfied that contract requirements are met.

---

##### **Account Ledgers**

The ADHS Accounting Office will maintain a complete, accurate and current accounting of all program funds received and expended. A complete self-balancing group of accounts will be maintained for the CSFP program fund. These records will be used to prepare all CSFP financial reports required.

All funds advanced up to the limit established by the contract, and all expenditures reported by the respective CER report, will be recorded in that local agency's file.

A separate ledger card will be established, by line item, from the budget page of the current contract with each respective local agency.

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##### **Financial Management System**

The ADHS Controller will issue to the local agencies the procedures for designing and maintaining a financial management system "Accounting and Auditing Procedures Manual for ADHS Funded Programs". (See guidelines on page VI-14 through VI-55.)

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*Continued on next page*



## Chapter Seven

### Financial Management

---

#### Section A

#### State Responsibilities (Continued)

---

##### **Determination of Costs- Administrative**

The State agency will record local agency cumulative expenditures as reported in the monthly CER report. State agency staff will then calculate reported in the monthly CER report. State agency staff will then calculate expenditure rates, considering the amount budgeted for each local agency for the entire year.

Likewise, the state administrative costs will be compared to the proportionate share of the state budget. These rates will be compared with the time elapsed on the contracted budget to determine over/underspending or disproportionate spending between the line item categories.

---

##### **Monthly reports**

Using the data on administrative costs, the CSFP Manager will compile a summary report by the 27<sup>th</sup> of each month.

---

## Chapter Seven

### Financial Management

---

#### Section B

#### Monthly Summary Report and Follow-Up

---

<b>Participation figures</b>	Total participation and local agencies significantly above and below assigned caseload.
<b>Expenditures</b>	Total administrative expenditures broken out by State agency and local agencies, monthly and cumulative figures, and percentages of proportionate budget for the fiscal year.
<b>Obligations</b>	Obligations, both monthly and cumulative figures, and percentages of proportionate budget.
<b>Cost per participant</b>	Average cost per participant for food and administration, both monthly and cumulatively, for the fiscal year.
<b>Action</b>	<p>Monthly, the CSFP Manager will analyze all data and take whatever action is necessary to maintain contract services.</p> <p>Local agencies will be notified of participation above or below acceptable limits.</p> <p>Quarterly, the CSFP Manager will negotiate changes in caseload, if necessary.</p>

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*Continued on next page*

## Chapter Seven

### Financial Management

---

#### Section B

#### Monthly Summary Report and Follow-Up (Continued)

---

##### Action (Continued)

Caseload will be redistributed to agencies meeting the following criteria:

- Those serving below the number of potentially eligible participants, according to the Affirmative Action average for the state
  - Those serving the highest priorities
  - Those with the ability to serve additional participants
-

## Chapter Seven

### Financial Management

---

#### Section C

#### Local Agency Responsibilities

---

##### **Fiscal Management System**

Each local agency will design and maintain a fiscal management system, which accurately accounts for all program funds received and expended. The system will enable the local agency to submit an accurate CER report no later than 30 calendar days following the end of the report month.

The system will include the minimum records, source documents, and procedures set forth in the Arizona DOA Procurement Rules and Regulations (see Appendix A).

---

##### **Capital Equipment Purchases**

Each local agency will request prior approval from the CSFP Manager before expending Program funds for any equipment costing more than \$1,000.00. After approval is received and equipment is purchased, a copy of the vendor's invoice and a Capital Equipment Expenditure (CEE) report will be submitted for reimbursement.

For those items costing more than \$1,000.00, the CEE report and the invoice(s) will be kept at the state CSFP office.

For those items costing more than \$1,000.00, the above forms will be forwarded to Inventory Control so that identification tags can be issued. Upon receipt of the equipment number tag, it will be affixed to the equipment.

---

##### **Computer Equipment / Software Purchase**

Prior approval by the CSFP Manager and the Food and Nutrition Service (FNS) is required for all computer items (hardware and software) purchased using program funds. After the purchase is completed, a copy of the vendor's invoice and an equipment inventory list will be submitted to the CSFP Manager.

Note: All equipment purchased must be encumbered within the contract period for which the funds are budgeted, i.e., by September 30<sup>th</sup> of that year.

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*Continued on Next Page*

## Chapter Seven

### Financial Management

---

#### Section C

#### Local Agency Responsibilities (Continued)

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**Annual inventory** Each local agency will annually inventory all property purchased with program funds and submit a certified correct copy of the inventory to the ADHS Inventory Control Officer by January 31<sup>st</sup>. Inventory records will identify all items and their locations. The records should identify items as paid for with CSFP funds. Equipment should be kept where specified. If equipment is removed from the premises, a log should be used to document its location.

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# Chapter Eight

## Non-Discrimination and Hearing Procedures

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### Overview

#### Policy

The Arizona CSFP Program and its contractors will not discriminate in hiring or providing services. Eligible applicants will be hired or served without regard to race, color, national origin, age, sex or disability.

Note: The State's policy for reasonable accommodation is in accordance with the American with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act, dated April 1994.

#### Contents

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# Chapter Eight

## Non-Discrimination and Hearing Procedures

---

### Section A

#### State Agency Responsibilities

---

##### State Agency Contract Statement of Non-Discrimination

The State agency will ensure that the Civil Rights and ADA assurance statement is in the local agency contract.

---

##### Civil Rights Training

The State agency is responsible for training local agency Directors in Civil Rights, including ADA, so that they in turn can train their staff.

The State agency will designate staff time to coordinate, implement, and conduct training, and to enforce civil rights efforts. Training may be provided at bi-monthly statewide staff meetings, by distance learning and/or at In-house meetings.

---

##### Public Notification of Program Benefits

The State agency will ensure that advocacy and minority organizations as well as the general public are informed of program benefits at least annually.

Notification will include availability of program benefits, eligibility criteria for participation, location of clinics and hours of service, rights and responsibilities, nondiscrimination policy, and Civil Rights and ADA complaint procedures.

Applicants and CSFP participants will be provided access to Title VI information and CSFP regulations upon request.

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*Continued on next page*

## Chapter Eight

### Non-Discrimination and Hearing Procedures

---

#### Section A

#### State Agency Responsibilities (Continued)

---

##### **State Agency Non-Discrimination Policy**

The Arizona CSFP provides applicants with key information in languages other than English, as needed. These materials include applications and information describing eligibility criteria and procedures for delivery of benefits.

The Arizona CSFP requires its local agencies to include the non-discrimination policy statements and Civil rights and ADA complaint procedure on all outreach materials, such as program information letters, brochures, bulletins, and newspaper, TV, and radio ads.

The Arizona CSFP requires the “And Justice for All” poster to be displayed in all clinics and warehouse distribution centers.

---

##### **Monitoring Non-Discrimination Policy**

The State agency monitors local agencies’ compliance with Civil Rights and ADA requirements during periodic reviews of reports which detail enrollment by ethnicity, and by review of customer satisfaction surveys. In addition, during Management Evaluations, files of those determined to be ineligible for CSFP services and those placed on the waiting list for services will be reviewed.

The State agency will maintain complete and thorough records of all activities to monitor Civil Rights and ADA compliance and any known complaints of discrimination made by CSFP applicants or participants.

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*Continued on next page*



## Chapter Eight

### Non-Discrimination and Hearing Procedures

---

#### Section A

#### State Agency Responsibilities (Continued)

---

##### State Agency Monitoring Evaluation Non-compliance notification

Areas determined to be out-of-compliance with non-discrimination policies during a Management Evaluation will be:

- Discussed with the appropriate local agency staff during the exit interview
- Identified in a written report, sent by certified mail with return receipt requested. The report must be sent within 21 calendar days from the State agency to the local agency. The report will:
  1. Request corrective action to be taken within 30 calendar days of initial findings
  2. Request a written response from the local agency within 21 calendar days. The response will assure implementation of specific methods, according to a time line, to bring the program into compliance
  3. Offer technical assistance from the State agency and/or state Affirmative Action Officer, where appropriate.

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*Continued on next page*

# Chapter Eight

## Non-Discrimination and Hearing Procedures

---

### Section A

#### State Agency Responsibilities (Continued)

---

##### State Agency Non-Discrimination Follow-up

The State agency will conduct follow-up reviews within 30 calendar days of the initial Management Evaluation to ensure that the program has been brought into compliance. Copies of all findings, recommendations, and correspondence will be forwarded immediately to USDA/FCS/WRO and the state Affirmative Action Officer. Technical assistance will be requested as necessary.

If voluntary compliance is not achieved by the local agency within 30 calendar days, notification and copies of all correspondence and documentation will be sent to the USDA Regional Office. Documentation will include the following:

- Relevant contracts, assurances, and agreements between the State agency and the local agency;
- List of names, titles, office mailing addresses, and office telephone numbers of the parties involved;
- List of available witnesses, their official titles, addresses, and a brief statement of the matter about which they can testify;
- A statement of all actions to achieve voluntary compliance.

---

##### Handling of Discrimination Complaints

The State agency will participate in the handling of complaints as detailed below.

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## Chapter Eight

### Non-Discrimination and Hearing Procedures

---

#### Section B

#### Local Agency Responsibilities

---

##### Local Agency Training

Local agencies will:

Ensure that new staff members be instructed about Civil Rights and Americans with Disabilities Act (ADA), during their orientation;

Ensure that, annually, all staff will attend training or a staff meeting where Civil Rights and ADA issues are reviewed.

---

##### Language/cultural Needs and Disability Needs

Ensure that bilingual staff and/or translation resources are available in areas where a significant proportion of non-English speaking persons reside.

Provide information about rights, obligations, and requirements of the CSFP Program in the applicant's/participant's language. Rights and responsibilities listed on the certification form will be read to or by the applicant in the appropriate language. Design nutrition education to meet the different cultural and language needs of program participants.

CSFP staff will ensure handicapped applicants and participants have unimpeded access to CSFP clinics and services.

---

##### Non-Discrimination Written Procedures

Develop and implement written procedures on how to provide CSFP services to all eligible participants. Services will be

*Continued on next page*

## Chapter Eight

### Non-Discrimination and Hearing Procedures

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#### Section B

#### Local Agency Responsibilities (Continued)

---

##### Local Agency Non-discrimination And Outreach

Perform outreach to migrants and homeless persons, as well as advocacy groups and associations that work with minority groups.

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##### Racial/Ethnic Data collection

Agencies must use separate questions on the application form or data input screen for the collection of data on race and ethnicity. Applicants may choose only one response to the ethnicity question, either “Hispanic or Latino” or “Not Hispanic or Latino”. Applicants must be offered the option of selecting one or more racial designations from the following categories:

American Indian or Alaska Native

Asian

Black or African American

Native Hawaiian or Other Pacific Islander

White

Visual identification shall be used to determine a participant’s racial/ethnic category for reporting purposes, and a participant may be included in the group to which he or she appears to belong, identifies with, or is regarded in the community as belonging. Participants may be asked to self-identify their racial group only after it has been explained, and they understand that the collection of this information is strictly for statistical reporting requirements and has no effect on the determination of their eligibility to participate in the program.

---

##### Civil Rights Compliance/ Complaints Records

Maintain complete and thorough records of all activities to monitor Civil Rights and ADA compliance and any known complaints of discrimination made by CSFP applicants or participants.

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##### Handling of Discrimination Complaints

Participate in the handling of complaints.

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##### Racial/Ethnic Reports

As requested, complete and submit FNS-191 Racial and Ethnic Group Participation Report.

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## Chapter Eight

### Non-Discrimination and Hearing Procedures

---

#### Section C

#### Handling of Complaints

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Complaints of discrimination based on race, color, disability, age, national origin, or gender, will be handled as follows. Local agency or State agency CSFP staff, as appropriate, will:

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**Offer assistance** Volunteer assistance to applicant or participant in making a written or verbal complaint. This assistance, if accepted, will be provided the same day as the complaint is made.

---

**Discrimination Complaint Documentation** Ensure that all of the complaints received are documented on the Complaint Record. Every effort should be made to have the following information:

- Identification of complainant, including address and phone number
- Narrative of the complaint. The narrative will include date(s) when the alleged discriminatory actions occurred and a description of the actions
- Name of CSFP agency and individual(s) against whom the complaint is filed
- Date complaint filed and with whom

Note: A complainant does not have to identify him or herself. Staff will accept an anonymous complaint and document it.

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*Continued on Next Page*

## Chapter Eight

### Non-Discrimination and Hearing Procedures

---

#### Section C

#### Handling of Complaints (Continued)

---

##### Tracking of Discrimination Complaints

Document all activities regarding the complaint, such as information or assistance given to the complainant and all information relating to the complaint:

- Maintain a case file of each complaint
  - Keep complainant informed of all actions taken
  - Encourage complainant to retain a copy of the complaint
- 

##### Notification

The CSFP Manager or other State CSFP staff will immediately forward all civil rights complaints to USDA, Director, Office of Civil Rights, Room 326\_W, Whitten Building, 1400 Independence Avenue, S.W., Washington, D.C. 2050-9410

The CSFP Manager upon receipt of a complaint. The CSFP Manager must submit a written record of the complaint(s) to the ADHS Director within 15 days.

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##### Consultation

The ADHS Human Rights Office will provide consultation and technical assistance to local agencies in order to avoid and/or eliminate discriminatory practices.

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## Chapter Eight

### Non-Discrimination and Hearing Procedures

---

#### Section D

#### Civil Rights/ADA Training

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##### Civil Rights/ ADA Training Policy

State agency staff is responsible for training local agency CSFP Directors on Civil rights and ADA, so that they in turn can train their staff.

All new local agency staff members will be instructed on Civil Rights and ADA during the orientation period.

Annually, all CSFP staff will attend training or a staff meeting where Civil Rights and ADA issues are reviewed.

Civil rights and ADA training will be documented in each staff member's training file.

---

##### Subjects Covered

Subjects to be covered when training local agency Nutritionists and CSFP Directors will include:

- Collecting and using racial/ethnic data
- Effective public notification systems
- Complaint procedures
- Review techniques for local agency monitoring of clinic procedures
- Resolution of noncompliance

Note: All training will be based on FNS instruction 113-2, Rev. 1. Local agency directors and staff are responsible for training their staff.

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*Continued on Next Page*

## Chapter Eight

### Non-Discrimination and Hearing Procedures

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#### Section D

#### Civil Rights/ADA Training (Continued)

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##### Non-Discrimination References

The State agency will keep on file all of the following:

FCS Instruction 113-2, Rev. 1;

Title VI (1964), 7 CFR 15;

Title IX, USDA Administrative Regulations;

Title IX, Education Amendments, 7 CFR 15a (gender discrimination);

Title 28, Department of Justice Regulations;

Section 504, Handicap Regulation 7 CFR 15b;

Americans with Disabilities Act of 1991;

Memorandum on Legality of Racial/Ethnic data collection;

Grassroots Organization Directory;

Self-evaluation;

Age discrimination Act of 1975, 7 CFR 15c.

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## Chapter Eight

### Non-Discrimination and Hearing Procedures

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#### Section E

#### CSFP Civil Rights and ADA Quality Assurance Criteria

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Criteria	Data Source
1. USDA nondiscrimination poster (And Justice for All) prominently displayed in clinic within viewing range of participants.	Observation
2. Knowledge/Documentation: a. Participant informed, regardless of eligibility or ineligibility, in a language she/he understands, that standards for participation in the program are the same for everyone. b. Participant signs a copy of the Verification of Certification (VOC) acknowledging her/his eligibility or ineligibility for services.	Participant interview Certifier interview VOC in participant's records
3. Eligible program participants receive services, as funds are available according to the Nutrition Risk Factors by Priority for Service.	VOC in participant record notes: a. Date of request b. Eligible/ineligible waiting list status
4. Program information materials provided in the appropriate language(s) of participant population served. All materials announcing program benefits include nondiscrimination statement.	Observation
5. Nutrition education provided: a. In the predominant language of participant population served b. With consideration to cultural beliefs and values of participants served	Monitoring visit documentation in participant records. Certifier interview.

*Continued on next page*

## Chapter Eight

### Non-Discrimination and Hearing Procedures

---

#### Section E

#### CSFP Civil Rights and ADA Quality Assurance Criteria (Continued)

---

Criteria	Data Source
<p>6. Participants interviewed periodically, using state and/or locally developed surveys, regarding:</p> <ul style="list-style-type: none"> <li>a. Feelings/attitudes about program services and participation;</li> <li>b. Treatment received from clinic personnel.</li> <li>c. Nutrition education received;</li> <li>d. Rights and obligation to receive program services;</li> <li>a. Persons to contact about complaints of discrimination.</li> </ul>	Record of participant responses from interview/survey.
<p>7. Local agency staff renders requested assistance to participants wishing to report complaints of discrimination to appropriate program officials.</p>	<p>Documentation of requests in local agency files.</p> <p>Participant interview.</p> <p>Certifier interview.</p>
<p>8. Known participant complaints of discrimination documented and reported to the CSFP Manager and the:</p> <p>USDA Office of Advocacy and Enterprise Washington, DC 20250</p>	<p>Documentation of requests in local agency files.</p> <p>Documentation in State CSFP office files.</p>
<p>9. Program population served matches ethnic composition of service population based on statistics for:</p> <ul style="list-style-type: none"> <li>a. Age</li> <li>b. Income</li> <li>c. Ethnicity/Race</li> <li>d. Gender</li> </ul>	<p>FNS -191</p> <p>Department of Economic Security, ADHS</p> <p>Economic and Health Statistics</p>

*Continued on Next Page*

## Chapter Eight

### Non-Discrimination and Hearing Procedures

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#### Section E

#### CSFP Civil Rights and ADA Quality Assurance Criteria (Continued)

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Criteria	Data Source
10. Local agency and state contacts outreach/referral agencies to review: <ul style="list-style-type: none"><li>a. CSFP Program benefits</li><li>b. CSFP eligibility criteria</li><li>c. Referral procedures</li><li>d. CSFP nondiscrimination policies and procedures</li></ul>	Documentation in local agency files or copies of distributed materials
.10. Annual public notification by the State agency of availability of program services: <ul style="list-style-type: none"><li>a. Contains nondiscrimination statement</li><li>b. Is directed to minority groups</li><li>c. Is accessible to handicapped applicants and participants</li></ul>	Documentation in State agency correspondence files or copies of distributed materials
11. Annual public notification by local CSFP agencies of availability of program services: <ul style="list-style-type: none"><li>a. Contains nondiscrimination statement</li><li>b. Is directed toward minority groups</li></ul>	Documentation in local agency files or copies of distributed materials
12. Availability of bilingual staff during clinic hours.	Personnel records observation
13. Local agency staff can explain their role in filing for a show cause meeting, fair hearing or discrimination complaint.	Staff interview

## **Chapter Eight**

### **Non-Discrimination and Hearing Procedures**

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#### **Section F**

#### **Non-Discrimination Hearing Procedures**

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##### **Overview**

All hearings will be held in accordance with 7 CFR 247.20, Fair hearing procedures and 7CFR 247.22, Administrative Appeal of State agency decision.

The total appeal process for applicants or participants will not exceed 45 calendar days from the date of receipt by the State agency of the request for a fair hearing.

The total appeal process for local agencies will not exceed 60 calendar days from the date of receipt by the State agency of the request for a fair hearing.

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## Chapter Eight

### Non-Discrimination and Hearing Procedures

---

#### Section G

#### Fair Hearings for Applicants/Participants

---

The State agency will provide the fair hearing as a forum for applicants or participants to appeal an adverse action.

The State or local agency will not limit or interfere with the applicant's or participant's right to request a fair hearing.

Note: If the applicant/participant has been denied participation at a previous fair hearing and cannot provide new evidence that circumstances relevant to program eligibility have changed in such a way as to justify a new fair hearing, the State or local agency can deny the request.

---

#### Applicant / Participant Fair Hearing Time frame

The applicant/participant has 30 calendar days from receipt of the "notice of adverse action" to postmark or hand-deliver a written request for a fair hearing. The request for a fair hearing must include a statement of the facts asserted and relief sought.

---

#### Procedure

Except for participants whose certification period has expired, participants disqualified from participation in the Arizona CSFP Program will continue to receive benefits if they appeal within 15 calendar days from receipt of the "notice of adverse action". CSFP program services will be provided until the ADHS Director reaches a decision or the certification period ends, whichever comes first.

Applicants/participants who are denied benefits at initial certification or at subsequent certifications may appeal the denial but shall not receive benefits while awaiting the hearing.

The Administrative Law Judge will make a recommendation to the ADHS Director based solely on the evidence presented at a fair hearing and the statutory and regulatory provisions governing the program.

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## Chapter Eight

### Non-Discrimination and Hearing Procedures

---

#### Section G

#### Fair Hearings for Applicants/Participants (Continued)

---

##### **Applicant / Participant Appeal Rights Notification Process**

At the time of denial of participation in or of disqualification from the program, the applicant/participant will be informed in writing of the right to a fair hearing. The mechanism for providing written notice to participants will be either through the ineligibility letter or the counseling/suspension form. All notifications will inform the applicant/participant of the right to self-represent or to be represented by a relative, friend, legal counsel or other spokesperson and their right to bring witnesses. The applicant/participant is entitled to introduce arguments, question or refute any testimony or evidence, confront and cross-examine adverse witnesses, and submit evidence to support their case. All pertinent documents may be examined prior to or during the fair hearing.

Note: As a matter of course, the Administrative Law Judge records all fair hearings.

A written request for a fair hearing must be sent or hand-delivered (see "Time Frame", page 16) no later than 30 calendar days from the date the agency mails the notice of adverse action. The request for a fair hearing will be addressed as follows:

Clerk of the Department  
Arizona Department of Health Services  
1740 W. Adams , Room 200  
Phoenix, Arizona 85007

Local agency staff may assist the participant/applicant in their preparation and submission of a written request for a fair hearing. The request must contain a statement of facts, the reasons the applicant/participant believes that they are entitled to a fair hearing, and the relief sought.

The CSFP Manager will be notified by the Clerk of the Department of a request for a fair hearing and the CSFP Manager will discuss the contents of the request with the local agency Director. Documentation of this notification will be maintained by the CSFP Manager or designee.

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*Continued on next page*

## Chapter Eight

### Non-Discrimination and Hearing Procedures

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#### Section G

#### Fair Hearings for Applicants/Participants (Continued)

---

When a fair hearing is requested, Arizona Revised Statutes, Title 41, Article 10 will control. The fair hearing will be held within 60 calendar days of the date of receipt of the request for the fair hearing after the notice of appeal is filed.

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#### **ADHS Administrative Counsel**

Fair hearing arrangements will be handled by the ADHS Administrative Counsel. The fair hearing will be held at the Office of Administrative Hearings. At least 30 calendar days advance written notice of the date, time, and place of the hearing will be sent by certified mail to the applicant/participant. This advance written notice will include an explanation of the fair hearing procedure. Failure to appear at a scheduled fair hearing without good cause may result in a decision in favor of the State agency.

The Administrative Law Judge or State agency may order, where relevant and necessary, an independent medical assessment or professional evaluation from a source mutually satisfactory to the applicant/participant and the State agency. The state agency will be responsible for the cost of the medical assessment.

---

#### **Denial or Dismissal of Request**

A request for a fair hearing will be denied if the written request is postmarked more than 30 calendar days from the date of the agency mails the notice of adverse action.

A request for a fair hearing may be dismissed if the request is withdrawn in writing by the applicant or the participant/authorized representative.

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*Continued on next page*

## **Chapter Eight**

### **Non-Discrimination and Hearing Procedures**

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#### **Section G**

#### **Fair Hearings for Applicants/Participants (Continued)**



## Chapter Eight

### Non-Discrimination and Hearing Procedures

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#### **Applicant/ Participant Time Frames for Fair-Hearing Decision/ Follow-Up**

The Administrative Law Judge shall issue a written decision within 20 calendar days after the hearing is concluded. Within 30 calendar days after the date the Administrative Law Judge sends a copy of the Administrative Law Judge's decision to the agency head, the agency head may review the decision and accept, reject or modify it.

The applicant/participant has 30 calendar days from the date of receipt of the final administrative decision to request rehearing or review of the final administrative decision. The request for rehearing or review will conform to the requirements of the Arizona Revised Statutes and the Arizona Administrative Code.

The applicant/participant may appeal the agency head's final administrative decision to the Superior Court pursuant to Title 12, Chapter 7, Article 6 of the Arizona Revised Statutes.

---

#### **Decision in Favor of the Applicant or Participant**

If the decision is in favor of the participant or the participant's authorized representative, the following will occur:

- The local agency will continue the benefits of participation until the end of the certification period
  - The local agency will modify the participant's record according to the findings of the fair hearing
  - If the decision is in favor of the applicant, the following will occur:
    - The local agency will enroll the applicant immediately and provide benefits as appropriate
- 

#### **Decision in Favor of the State Agency**

If the decision is in favor of the State agency, the following will occur:

- The local agency will discontinue benefits as soon as administratively feasible
  - The State agency may attempt to collect claims for benefits improperly issued
- 

*Continued on next page*

## **Chapter Eight**

### **Non-Discrimination and Hearing Procedures**

---

#### **Section G**

#### **Fair Hearings for Applicants/Participants (Continued)**

---

##### **Applicant/ Participant Availability of Fair Hearing Records**

The State and local agency will make all fair hearing records and decisions available for public inspection and copying; however, the names and addresses of applicants/participants will be kept confidential in accordance with 7 CFR 247.36.

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## Chapter Eight

### Non-Discrimination and Hearing Procedures

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#### Section H

#### Fair Hearings for Local Agencies/Food Banks

---

##### Policy

The State agency will provide the fair hearing as a forum for local agencies to appeal adverse actions.

The State agency will provide the local agency with 60 calendar days advance written notification of pending adverse action. Notwithstanding an appeal, a local agency that is permitted to continue in the program must continue to comply with the terms of its contract with the ADHS.

The State agency will not limit or interfere with a local agency's right to request a fair hearing.

---

##### Local Agency/ Food Bank Time frame

To contest an adverse action, a local agency must file a written request for a fair hearing with the Clerk of the Department, Arizona Department of Health Services, 1740 W. Adams, Room 200 , Phoenix, Arizona 85007 within 30 calendar days from the date the agency mails the written notice of adverse action.

---

##### Local Agency/ Food Bank Procedures

The request for a fair hearing must contain a concise statement of the facts and the reason(s) the local agency believes it is entitled to a fair hearing and any relief sought. If the local agency elects to be represented by an attorney, the written request must also contain the name, address and telephone number of the attorney.

The local agency is entitled to introduce arguments, question or refute any testimony or evidence, including confront and cross-examine adverse witnesses, and submit evidence to support their case. All pertinent documents may be examined prior to the fair hearing.

The fair hearing will be conducted in accordance with Arizona Revised Statutes, Title 41, Article 10.

Note: As a matter of course, the Administrative Law Judge records all fair hearings.

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*Continued on next page*

## Chapter Eight

### Non-Discrimination and Hearing Procedures

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#### Section H

#### Fair Hearings for Local Agencies/Food Banks (Continued)

---

##### **ADHS Administrative Counsel**

Fair hearing arrangements will be handled by the ADHS Administrative Counsel. The local agency requesting a fair hearing will be provided:

At least 30 calendar days advance written notice of the date, time, and place of the fair hearing. This advance written notice will include an explanation of the fair hearing procedure.

A request for a fair hearing will be denied if the written request is postmarked more than 30 calendar days from the date the agency mails the written notice of adverse action.

A request for a fair hearing may be withdrawn in writing by the local agency.

Failure to appear at a scheduled fair hearing without good cause may result in a decision in favor of the State agency.

An Administrative Law Judge will decide the validity of the state agency's action based solely on the evidence presented at the fair hearing and the statutory and regulatory provisions governing the program or contract between the parties. The basis for the decision will be stated in writing, and will contain formal findings of fact and conclusions of law and will be issued within 20 calendar days after the hearing is concluded.

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##### **Local Agency/ Food Bank Decision Notification/ Follow-Up**

Within 30 calendar days after the date the Administrative Law Judge sends a copy of the Administrative Law Judge's decision to the agency head, the agency head may review the decision and accept, reject or modify it. The local agency has 30 calendar days from the date of receipt of the final administrative decision to request a rehearing or review of the final administrative decision.

The local agency may appeal the agency head's final administrative decision to the Superior Court, pursuant to Title 12, Chapter 7, Article 6 of the Arizona Revised Statutes.

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## **Chapter Eight**

### **Non-Discrimination and Hearing Procedures**

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